Final Modification Report

P300 'Introduction of new Measurement Classes to support Half Hourly DCUSA Tariff Changes (DCP179)'

P300 seeks to introduce new Measurement Classes for aggregated Half Hourly-settled customers (for current transformer and whole current metered domestic, and whole current non-domestic markets). P300 builds on Rejected Modification P280 and aligns with DCUSA DCP179, which seeks to implement Half Hourly DCUSA tariff changes. P300 would enable LDSOs to charge Suppliers on an aggregated basis as well as on a site specific basis.

The BSC Panel recommends **approval** of P300

This Modification impacts:

- Suppliers
- Licenced Distribution System Operators (LDSOs)
- Supplier Meter Registration Agents (SMRAs)
- Half Hourly Data Aggregators (HHDAs)
- Half Hourly Data Collectors (HHDCs)
- Half Hourly Meter Operator Agents (HHMOAs)
- The Supplier Volume Allocation Agent (SVAA)
- ELEXON

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What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase

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About This Document

This is the P300 Final Modification Report, which ELEXON has submitted to the Authority on behalf of the BSC Panel. It includes a summary of the Workgroup's assessment, the Panel's full views and the responses to both the Workgroup's Assessment Consultation and the Panel's Report Phase Consultation. The Authority will consider this report and will decide whether to approve or reject P300.

There are five parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, benefits/drawbacks and proposed implementation approach. It also summarises the Workgroup's key views on the areas set by the Panel in its Terms of Reference, and contains details of the Workgroup's membership and full Terms of Reference.
- Attachment A contains the approved redlined changes to the BSC and CSDs for P300.
- Attachment B contains the full responses received to the Workgroup's Impact Assessment.
- Attachment C contains the full responses received to the Workgroup's Assessment Procedure Consultation.
- Attachment D contains the full responses received to the Panel's Report Phase Consultation.

Any questions?

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1 Summary

Why Change?

P300 has been raised to support the changes to Half Hourly (HH) Distribution Use of System (DUoS) charges being proposed by Distribution Connection and Use of System Agreement (DCUSA) Change Proposal (DCP) 179 'Amending the CDCM tariff structure'.

Solution

The proposal seeks to split Measurement Class E into three as follows:

- relabeling of Measurement Class E, which will be designated for HH current transformer (CT) Metering Systems and which will be used to cater for a site specific DUoS bill; and
- the creation of two new Measurement Classes for HH aggregated DUoS billing:
    - one for domestic HH CT and whole current (WC) Metering Systems; and
    - one for non-domestic HH WC Metering Systems.

In addition, the proposal sets out that the Supplier Volume Allocation Agent (SVAA) will carry out some of the aggregation of data for Metering Systems registered to the new Measurement Classes and send this onto the Supplier and Licensed Distribution System Operator (LDSO).

Impacts & Costs

P300 will impact all LDSOs, HH Suppliers, HH Data Aggregators (HHDAs), HH Data Collectors (HHDCs), HH Meter Operator Agents (HHMOAs) and Supplier Meter Registration Agents (SMRAs), as well as BSCCo and the SVAA.

Central costs will be approximately £120k. Few participants provided actual cost estimates, with many of these provided confidentially. The indicative costs varied across all impacted roles and range from no or low costs through to medium or significant.

Implementation

The P300 Workgroup is recommending implementation on 5 November 2015 as part of the November 2015 BSC Systems Release, subject to the Authority's decision being received on or before 5 November 2014; or 25 February 2016 if the Authority's decision is received after 5 November 2014 but on or before 25 February 2015. This is to allow participants at least 12 months lead time to implement the changes to their systems and processes and caters for the Master Registration Agreement (MRA) Data Transfer Catalogue (DTC) changes.

Recommendation

The Panel unanimously agrees with the Workgroup's majority view that P300 would better facilitate Applicable BSC Objectives (d). The Panel therefore recommends that P300 is approved.

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DUoS charges and related industry changes

For HH settled customers, distribution network charges (also known as 'Distribution Use of System charges' or 'DUoS charges') are calculated on a site specific basis. With the introduction of HH capable smart and advanced Meters into the Non-Half Hourly (NHH) settled market, more NHH sites will have the ability to be settled on a HH basis. This could significantly increase the amount of sites where LDSOs will have to calculate site specific DUoS charges.

To ensure that LDSOs have DUoS charges that are more reflective of the use of system (UoS) to better encourage the move to HH Settlement, the industry has raised three DCPs (DCP103, DCP151 and DCP179) and one BSC Modification Proposal (P280).

DUoS Charges

The DUoS charge covers the cost of receiving electricity from the national transmission system and feeding it directly into homes and businesses through the regional distribution networks. These networks are operated by LDSOs

DCP103

DCP103 'DUoS Charges for sub 100kw HH settled sites' was raised in July 2011 but subsequently withdrawn. This sought to help facilitate the move from the NHH settled market into the HH settled market by attempting to ensure that DUoS charges would remain the same for NHH customers electing to be settled HH under Measurement Class E. In conducting this work, the DCUSA consultation concluded that the industry would be better served settling HH customers on an aggregated basis rather than on a site specific basis. However, this was deemed outside of the scope of the DCP.

Measurement Classes

The Measurement Class of a Metering System reflects how it is settled i.e. HH or NHH. There are currently five Measurement Classes:

A: NHH metered
B: NHH Unmetered Supply (UMS)
C: 100kW or above HH metered
D: HH equivalent UMS
E: Non-mandatory HH metered

P280

Electricity North West raised P280 'Introduction of new Measurement Classes' on 29 November 2011. This sought to introduce new non-mandatory Measurement Classes for HH-settled customers in the 'domestic' and 'small and medium enterprise' (SME) markets, and to require the SVAA to provide LDSOs with aggregated HH consumption data for Metering Systems registered to those new Measurement Classes.

At its meeting on 10 August 2012, the BSC Panel recommended to the Authority that it approve P280. However, the Authority subsequently rejected P280, stating in its decision document (dated 6 November 2012):

> *"The P280 proposal alone does not facilitate any change to the way sites will be settled and charged for UoS. A change to the UoS charging methodology is required in order for any benefits to be realised. Until we are able to make an assessment of the most appropriate UoS charging structure for sites with demand below 100kW that wish to be settled HH, we do not consider we can approve this modification. This is because it is not certain whether the P280 proposed change will be required if a different approach is taken in developing the UoS charging methodology. Approving the P280 proposal may therefore result in wasted costs to the industry."*

DCP151

Electricity North West raised DCP151 'HH Aggregated tariffs' in June 2012 to amend the Common Distribution Charging Methodology (CDCM) to cater for the introduction (subject to approval) of three HH aggregated Measurement Classes raised under P280. The resulting tariffs would have been the same in structure and rates as those currently on

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NHH tariffs excluding NHH preserved and NHH export tariffs. This was withdrawn when the Authority rejected P280.

DCP179

Electricity North West raised DCP179 'Amending the CDCM tariff structure' in June 2013, to amend the existing tariff structure by introducing HH metered tariffs for connections below 100kW. To enable this, it seeks to introduce new tariffs based on the receipt of HH aggregated data. It builds on the work undertaken by the Distribution Charging Methodologies Forum (DCMF) Methodologies Issue Group 22 (MIG 22), which is a sub-group that was formed by the LDSOs and Suppliers to address the anomalies between the two different cost allocation mechanisms for HH and NHH tariffs in the CDCM.

Aggregated Data

Currently, HH Data Aggregators (HHDAs) for HH sites send the D0040 'Aggregated Half Hour Data File' data flow to the SVAA. The D0040 data flow includes Consumption Component Classes (CCCs), which detail the aggregated data instead of the site specific data. However, the LDSOs only receive the site specific data through the D0036 'Validated Half Hourly Advances for Inclusion in Aggregated Supplier Matrix' and D0275 'Validated Half Hourly Advances' data flows, which they receive from the HH Data Collector (HHDC).

With the rollout of smart and advanced metering, there is the potential for the percentage of the market settled HH to increase substantially. Without any mechanism for LDSOs to utilise and bill Suppliers on an aggregated basis, they will need to use site specific billing for these customers. This will be disproportionately expensive and not reflective of the actual DUoS

There are also benefits to Settlement for moving to HH metered, as this is considered more accurate.

Impacts on P272

It is now mandatory (since 6 April 2014) that all sites in Profile Classes (PCs) 5-8 must have an advanced (i.e. HH capable) Meter regardless of when installation took place. This is not to say that these HH capable Meters must be settled HH. However, Suppliers can elect to settle these Metering Systems HH if they wish (or if the customer wishes them to do so).

Smartest Energy raised P272 'Mandatory Half Hourly Settlement for Profile Classes 5-8' on 20 May 2011. P272 proposed mandatory HH Settlement for PCs 5-8 from 1 April 2014. P272 contends that to settle such sites on average profiled data, rather than on HH data, leads to inaccuracies in Settlement and masks individual customer behaviour. The P272 Workgroup put forward an alternative solution with an Implementation Date of April 2015.

The Panel made its final recommendation that P272 should be rejected at its meeting on 13 December 2012. P272 is currently with the Authority for decision, but on 6 February 2014 it directed the Panel to consult again on the Implementation Date. The Authority has advised that it is minded to approve P272.

DCP179 (and P300) enables more reflective DUoS charges to be put in place. This would mean that WC NHH PC 5-8 Metering Systems that move to HH Settlement won't be

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penalised through DUoS charges. It is hoped that having the reflective DUoS charges in place will reduce a known barrier to elective HH Settlement but would also support the transition period for implementing P272. The Authority directed the BSC Panel to consult on a revised Implementation Date for P272 to allow its decision to take account of ongoing changes to distribution network charging. ELEXON issued this consultation on 1 August 2014 with responses due back on 1 September 2014. The Panel will be asked to make a recommendation to the Authority on a revised Implementation Date at its meeting on 11 September 2014.

What is the issue?

The BSC contains a number of provisions for providing LDSOs with the metered data they need for charging purposes. However, these don't provide a mechanism for distinguishing between HH-settled customers whose network charges should be calculated on a site specific basis, and those whose network charges should be calculated on an aggregated basis. P300 supports DCP179 by proposing to create new Measurement Classes associated with HH aggregation under the BSC.

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3 Solution

Proposer's proposed solution

P300 builds on the solution put forward under P280 and aligns to the requirements of DCP179. It proposes the following:

- Measurement Class E will be split into three Measurement Classes (for HH Metering Systems that are not 100kW Metering Systems). It does this by renaming Measurement Class E and introducing two new Measurement Classes for HH sites, which will be used for aggregated DUoS billing, as follows:
    - rename Measurement Class E to reflect that it is intended for HH current transformer (CT) metered Metering Systems that have site specific DUoS billing and are not 100kW Metering Systems;
    - introduce new Measurement Class F for domestic HH CT and whole current (WC) Metering Systems that have aggregated DUoS billing and are not 100kW Metering Systems; and
    - introduce new Measurement Class G for non-domestic HH WC metered Metering Systems that have aggregated DUoS billing and are not 100kW Metering Systems.

  This will not mandate Suppliers to use the new Measurement Classes, who may continue to use Measurement Class C and the redefined Measurement Class E if the Metering System is HH settled. In addition, it does not mandate the migration to HH metering. P300 only facilitates the DCP179 changes by creating new Measurement Classes for aggregated DUoS billing.[1]

- Measurement Classes F and G will use the same CCCs as Measurement Class E, whether it is for import or export customers.
- HHDAs will need to implement the changes so that they can process the amended D0040 and D0298 'BM Unit Aggregated Half Hour Data File' data flows.
- LDSOs will need to specify which Standard Settlement Configuration (SSC)[2] should be used to report aggregated HH data for each relevant Line Loss Factor (LLF) Class (LLFC), since the D0030 'Non Half Hourly DUoS Report' data flow[3] requires consumption data to be reported against an SSC.
- The SVAA system will process the amended data flows and the mapping information in order to include the relevant data in the D0030 data flow that the LDSOs use for aggregated DUoS billing.
- HHDCs must not send D0036 and D0275 data flows to LDSOs for the new Measurement Classes, but will instead send the D0010 'Meter Readings' data flow. Suppliers will not receive the D0010 data flow and will continue to receive the D0036 and D0275 data flows, which will include the precision of the metering data.

Does P300 mandate HH metering?

P300 does not mandate the migration to HH metering; it only facilitates the DCP179 changes by creating new Measurement Classes for aggregated DUoS billing

[1] However, DCP179 is seeking to mandate the use of the appropriate Measurement Class for DUoS billing purposes if a site is registered as HH.

[2] This will be an LDSO SSC, and not a Supplier SSC. This will not be a default SSC such an unrestricted SSC.

[3] The P300 Workgroup has recommended that the DTC changes capture a revision to the title to reflect that this will now also include HH aggregated data.

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- The Performance Level for Measurement Classes E, F and G will be 99% of energy settling on actual data at the First Reconciliation Volume Allocation Run (R1) with subsequent Settlement Runs also at 99%. Supplier Charges will be £0 for R1 and subsequent runs up to the Final Reconciliation Volume Allocation Run (RF), which will remain unchanged at £1.43 per chargeable MWh.

Workgroup's potential alternative solution

During its discussions on who should carry out the aggregation, the P300 Workgroup developed an alternative solution. However, the majority of the Workgroup agreed that this alternative was not better than the proposed. The Workgroup therefore did not recommend this above the proposed solution and therefore did not put forward an alternative solution for the Assessment Procedure Consultation. However, it wanted to seek views on this alternative solution in the consultation.

Under the alternative solution, the HHDA would receive information from Supplier Meter Registration Agents (SMRAs) on which LLFCs were applicable for aggregation. The HHDA would then aggregate the HH data before submitting the aggregated data to the Supplier and LDSO using two new data flows.

This would mean that the LDSO would have to process the data in their billing system to the appropriate time bands associated with each DUoS tariff instead of this activity being undertaken by the SVAA. The LDSO would send two new data flows, one to any embedded LDSOs within the host LDSO's network and one to the Supplier. Likewise, Suppliers will have to process the new data flows together with any validation they wish to undertake. Otherwise, the solution is the same as the proposed solution. Further details of the alternative solution, which the Workgroup discussed and consulted upon, are set out in the P300 Impact Assessment document. This is available on the P300 page of the ELEXON website.

Respondents to the Assessment Consultation also did not support this potential alternative, with one noting that it would have a higher impact on more parties thereby extending the required implementation timeframes.

The Workgroup unanimously confirmed its initial majority view that there were no alternative solutions, which were better than the proposed solution.

BSC legal text

The proposed redlined changes to the BSC and Code Subsidiary Documents (CSDs) to deliver the P300 proposed solution can be found in Attachment A.

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Estimated central implementation costs of P300

The total indicative central implementation cost for P300 is approximately £120k. This comprises:

- approximately £112k in SVAA and PARMS costs (six months lead time); and
- approximately £8k (34 man days) in ELEXON effort.

These are one-off implementation costs, and there would be no on-going central operational costs.

The SVAA changes involve amending the SVAA system, which will need to process the amended data flows and the newly updated mapping information received. The SVAA has to include the relevant data in the D0030 data flow. The costs also include testing and deployment.

The proposed solution also impacts the PARMS Application, specifically the PARMS Serial SP08 'Energy and MSIDs on Actuals'. Whilst the data file structure sent from SVAA to the PARMS will not change, the changes to the Performance Level will require system changes.

The ELEXON costs include managing the implementation project and updating the relevant BSC Sections, CSDs and other documentation, and will include implementation of changes to reporting and processes.

Indicative industry costs of P300

Supplier, HH Supplier Agent, LDSO and SMRA respondents to the Industry Impact Assessment stated that they would be impacted by P300. The Workgroup noted the varied and large implementation costs indicated in the Implementation Assessment responses and that some respondents had recognised the benefit in removing one of the perceived barriers to migrating to HH Settlement, which respondents expect would lead to data being more accurate.

The Workgroup considered whether there were potential impacts on micro-generators. However, it concluded that this was not relevant as the Export CCC ids were not changing and noted that no respondents to the Impact Assessment highlighted any impacts on this area.

Because of the varied and large implementation costs indicated in the Industry Impact Assessment, some of which was provided confidentially, Ofgem was keen to understand to what extent the responses include costs for implementing DCP179, P272 or other costs beyond P300. The Workgroup therefore included additional questions to provide respondents with an opportunity to provide updated implementation costs, particularly as the DCP179 consultation had been issued and the solution had been further defined since the Workgroup issued its Industry Impact Assessment.

Few participants provided actual estimates, with many of these provided confidentially. The indicative costs varied across all impacted roles and range from no or low costs through to medium or significant.

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LDSOs and SMRAs respondents to the Assessment Process Consultation have indicated costs up to £60k, though many indicated less than this. Supplier costs were indicated as not significant to significant, with some of these including changes to in-house Supplier Agents systems and processes. HH Supplier Agent costs were indicated to be low to medium.

P300 impacts

Impact on BSC Parties and Party Agents	
Party/Party Agent	Impact
Suppliers	Suppliers will have the option of receiving bills based upon aggregated and site specific data. In the case of gaining a site that is utilising one of the new Measurement Classes, the Supplier will need to either re-register it (fulfilling any other requirements associated with that Measurement Class, such as ensuring applicable Metering Equipment installed appropriate to the Measurement Class) or amend its systems to accept the appointment. Suppliers may wish to validate their DUoS bills to ensure that they don't receive site-specific invoices for Measurement Class F and G Metering Systems.
LDSOs	LDSOs will need to change the way they operate and may need to amend billing systems. This may require new LLFCs and associated LLFs. In addition, depending upon when the change is implemented, all LDSOs may need to make mid-year re-submissions for their LLFs.
SMRAs	SMRAs will need to ensure that the SSC for Metering Systems using the new Measurement Classes are not populated in SMRS.
HHDAs	HHDAs will need to change the way they generate aggregated data for submission to the SVAA.
HHDCs	HHDCs will need to change what data flows they send to LDSOs.
HHMOAs	HHMOAs will need to be able to process the new Measurement Classes within their systems.

Impact on Transmission Company
No impact.

Impact on BSCCo	
Area of ELEXON	Impact
Market Domain Data (MDD)	To add new valid values to MDD and process MDD Change Requests to enter the new Measurement Classes into MDD.
LLFs	There will be a need to process mid-year re-submissions for LLFs.

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Impact on BSC Systems and process	
BSC System/Process	Impact
SVAA (ISRA) Software	To introduce system changes to aggregate data.

Impact on Code	
Code Section	Impact
Section S Annex S-1	To reference Performance Levels for the new Measurement Classes and any changes to Supplier Charges.
Section S Annex S-2	To add new sub aggregation by LLFC.
Section V	Description of data provided for DUoS reporting purposes.
Section W	Reference the new Measurement Classes and show which classes are relevant for NHH Trading Disputes.
Section X Annex X-2	Include the summations and acronym updated in Annex S-2; expand the definitions of Measurement Class to include the redefined Measurement Class E and new Measurement Classes F and G; and extend definition of Consumption Level Indicator A to Measurement Classes F and G.

Impact on Code Subsidiary Documents	
CSD	Impact
BSCP502	Reflect changes in respect to HHDCs.
BSCP503	Reflect changes in respect to HHDAs.
BSCP507	Reflect the provision of LDSO mapping data to the SVAA.
BSCP508	Reflect changes in respect to the SVAA.
BSCP536	Reflect changes to Supplier Charges.
CoP10	Reflect that Code of Practice (CoP) 10 will be used for new Measurement Classes F and G.
SVA Data Catalogue	If P300 is approved, ELEXON will develop and consult on the necessary redlined changes as part of the implementation project to reflect any changes under the DTC. It will also introduce the new paper flow 'PXXX' for LDSOs to provide mapping data to the SVAA, which will be given a unique reference number.
SVAA (ISRA) Conceptual Process Model	The SVAA (ISRA) software documentations will be updated to reflect the changes to software and process. These will be updated as a consequential change.
SVAA (ISRA) Functional Definition & User Catalogue	The SVAA (ISRA) software documentations will be updated to reflect the changes to software and process. These will be updated as a consequential change.
SVAA (ISRA) Logical Data Design	The SVAA (ISRA) software documentations will be updated to reflect the changes to software and process. These will be updated as a consequential change.

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Impact on Code Subsidiary Documents	
CSD	Impact
SVAA (ISRA) Technical Specification	The SVAA (ISRA) software documentations will be updated to reflect the changes to software and process. These will be updated as a consequential change.
SVAA User Requirement Specification	The SVAA (ISRA) software documentations will be updated to reflect the changes to software and process. These will be updated as a consequential change.
Impact on other Configurable Items	
Configurable Item	Impact
PARMS User Requirement Specification	Amend the Performance Level for Measurement Class E and include Measurement Classes F and G in PARMS serial SP08c for PARMS reporting and Supplier Charges.

Impact on Core Industry Documents and other documents	
Document	Impact
Distribution Connection and Use of System Agreement	As per DCP179.
Master Registration Agreement	Amendments to certain data flows under the DTC.

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5 Implementation

Recommended Implementation Date

The Workgroup recommends an Implementation Date for P300 of:

- 5 November 2015 if the Authority's decision is received on or before 5 November 2014; or
- 25 February 2016 if the Authority's decision is received after 5 November 2014 but on or before 25 February 2015.

The lead-time is driven by the time required by respondents to the Assessment Procedure Consultation to make the necessary system changes to facilitate the implementation of P300 and caters for the MRA DTC consequential changes, which will take approximately six months to develop and progress. Indicative BSC Agent lead times are approximately six months.

Workgroup's consideration of the Implementation Date

The Workgroup originally proposed an Implementation Date of 1 April 2016 (allowing for at least 15 months lead time) following responses to the Industry Impact Assessment. These responses indicated a variety of lead times to implement P300.

Workgroup members noted ELEXON's view that the responses were likely to include the implementation of DCP179 as well as P300, and that in some cases may have included migration to HH metering. Therefore, the responses may not necessarily reflect the estimated lead times for implementing P300. The Workgroup noted that many respondents indicated either a 12 month or an 18 month lead time. The Workgroup felt that it was achievable for industry to implement P300 by 1 April 2016 so as long as a decision from the Authority was received by 31 December 2014, as this would provide a minimum of 15 months lead time to implement P300.

At the time of the P300 Impact Assessment, DCP179 had not been out for consultation and impact assessment. In addition, because of the long lead times indicated by some respondents under the Industry Impact Assessment, Ofgem was keen to understand to what extent the responses include the implementation lead times for DCP179, P272 or other changes beyond P300. The Assessment Consultation therefore included additional questions to provide respondents with the opportunity to provide updated implementation lead times, particularly as the DCP179 consultation had been issued and the solution had been further defined since the Workgroup issued its Industry Impact Assessment.

Responses to the Assessment Consultation (15 of 17 responses) indicated support for the 1 April 2016 Implementation Date. However, the Workgroup felt that some of the longer lead times were outliers and noted that most required 12 months or less to implement the change. The Workgroup decided that with this information and an understanding that the DCP179 Working Group was proposing a 1 April 2015 Implementation Date, a 12 month lead time was sufficient time for participants to implement changes. Members didn't feel there was a need to align with a 1 April date and therefore agreed that P300 should be implemented as part of a BSC Systems Release. It therefore identified the November 2015 BSC Release for implementing P300, subject to receipt of an Authority decision 12 months prior, with a backup of February 2016 BSC Release if this could not be met.

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The P300 Workgroup noted that BSC Agents would need approximately six months to implement BSC System changes. The Workgroup also noted that the changes to the data flows would take approximately six months to develop and progress through the MRA change process. Therefore the P300 Workgroup believed that the 12 month lead time was appropriate to allow the MRA DTC changes to be progressed before participants could fully plan and start the implementation of P300.

The Workgroup noted that should P272 get approval with an Implementation Date of 1 April 2016, then:

- with an implementation of DCP179 on 1 April 2015, Suppliers would be able to migrate PC5-8 Metering Systems with CTs to Measurement Class E and take advantage of the new DUoS tariff for site specific non-domestic CT Metering Systems; and
- with an implementation of P300 on 5 November 2015 and DCP179 already implemented, Suppliers would be able to migrate PC5-8 WC Metering Systems to Measurement Class G and take advantage of the new DUoS tariff for aggregated non-domestic WC Metering Systems.

The Workgroup believes that this would help the migration process and help to minimise a bulk change of Measurement Class on the Implementation Date for P272.

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Workgroup views on Measurement Classes and CCCs

Views on New Measurement Classes

The Workgroup discussed the proposal to split Measurement Class E into three Measurement Classes, with the introduction of two new Measurement Classes (F and G) and relabeling of Measurement Class E. The Workgroup did not believe that the use of these Measurement Classes should be mandated under P300, but noted that DCP179 may in effect do so under its solution.

The Workgroup supported this approach, but one member suggested that there might be benefit in the creation of an additional Measurement Class H for non-domestic CT metering for micro-businesses that would also have aggregated HH DUoS billing. This was based on the belief that CT metered Micro Businesses in PC 3 or 4 moving to a HH site specific tariff with no option to opt out or move to an HH aggregated tariff would be a breach of Supply Licence Condition (SLC) 47, which relates to privacy issues associated with access the Meter read data. Some members believed that P272 would require PC 3 – 4 Metering Systems with Advanced Meters to be registered as HH and would therefore be registered to Measurement Class E leading to the breach.

The Workgroup agreed to communicate this to the DCP179 Working Group and raised awareness through the Assessment Consultation with a question on the subject. ELEXON advised that adding a new Measurement Class would require an amendment to the DCP179 proposal, so would have to be subject to the DCP179 Working Group agreeing to amend its solution.

Respondents to the proposal to add a new Measurement Class H were split, with three clearly in favour of the proposed changes and six against. Other respondents that were not explicitly for or against did provide information and views for consideration by the Workgroup. The P300 Workgroup noted the responses and agreed with the Proposer that the issue could be addressed by amendment to Measurement Class G, but that this would have to be subject to the DCP179 solution aligning with this.

The DCP179 Working Group ultimately disagreed with the need for a new Measurement Class or amendment to Measurement Class G to deal with Micro Businesses with CT metering. This decision was based on Ofgem and ELEXON's view that P272 did not require PC 3 and 4 Metering Systems with Advanced Meters to be registered as HH under P272, as SLC 12.18 requires that an Advanced Meter is installed at relevant premises, which is defined by SLC 12.17 as a Metering Point that falls within PC 5 - 8. It was also the view of DCP179 Working Group that as P272 only covers PCs 5 – 8, customers on PCs 3 or 4 would be opting to allow HH data to be accessed and used on a more regular basis and therefore the privacy issue was not relevant. It was also noted that the perceived issue already exists in theory for 100kW Metering Systems, which must be registered as HH on Measurement Class C and which are subject to site specific DUoS billing.

As DCP179 did not amend its solution, P300 could not reflect a solution that would not have supported DCP179. However, one Workgroup member felt that the DCP179 and P300 solution should provide an aggregated tariff for Micro Businesses with CT metering, noting that this was provided for domestic customers and questioning what the difference is. The Proposer, who is also the Proposer for DCP179, advised that the DCP179 Working Group decision in regard to CT metered customers was to apply aggregated DUoS bills to domestic customers and not non-domestic. He advised that this was debated within the DCP179 Working Group, which its solution was in fact allowing both site specific and

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aggregated tariffs due to the privacy issue being more focussed to an individual than may be the case for a Micro Business.

ELEXON noted that as DCP179 wasn't amending its solution, and as P300 was raised to facilitate the DCP, then it would not be efficient to introduce something different. It has been noted that P280 was rejected because there was no corresponding DCP, so there was a risk that P300 would also be rejected. However, ELEXON advised that a new DCP could be raised to introduce a new DUoS tariff, which could include a new BSC Modification to amend or introduce a new Measurement Class to facilitate that DCP.

Views on Consumption Component Classes

The proposal was to have 10 new CCCs each for the new Measurement Classes, six for Import and four for Export. The Workgroup supported this, but there was a minority view that there were already too many CCCs and the addition of others would increase the size of certain data flows. ELEXON advised that if the Performance Level was aligned with the P272 solution (99% actual Meter reads at R1 for non-mandatory HH metering), then the least impact on PARMS and Supplier Charges would be to keep the same CCCs. The Proposer agreed with this approach and therefore amended the proposal. The Workgroup also agreed with this, so did not propose an alternative that created new CCCs.

Views on Performance Levels and Supplier Charges

The Workgroup noted that under P272 the Performance Level for HH Meters that are less than 100kW would move to 99% of energy settling on actual data at R1 Run rather than the current 99% at RF. The group didn't want to undermine P272 and thought that P300 should also reflect the same proposed Performance Level for Measurement Class G, as well as E.

Initially, the Workgroup believed that the Performance Level for Measurement Class F should be aligned with that for Measurement Class A (NHH metered). However, once the Proposer amended the solution to use the same CCCs, the Proposer and Workgroup agreed that the Performance Level for all three Measurement Classes should be aligned to 99% at R1 and at all subsequent runs.

One Workgroup member felt that 90% at R1 for Measurement Classes E, F and G would be better and more achievable due to the issues with interoperability and communications failures. However, when considering that P272, if approved, would set this at 99% at R1 and that it was unlikely that there would be any significant uptake of HH Settlement for PCs 1-4 in the first few years following implementation, the Workgroup didn't propose an alternative solution.

Supplier Charges

Impact on SP04

The Workgroup noted that SP04 only reports on NHH sites that meet the requirements of 100kW and therefore require mandatory HH metering; SP04 does not report on Measurement Class E sites, even though the CoP requirements are more stringent for Measurement Class C. As SP04 doesn't currently report on Measurement Class E, the Workgroup didn't believe that this Modification should propose it.

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Impact on SP08c

The Workgroup believed that the Supplier Charges should be kept at the current level, which is a charge at RF, but that the Supplier Charges should reflect the changes to the Performance Level. Therefore, the Proposer and the Workgroup agreed that for R1, Second Reconciliation Volume Allocation Run (R2) and Third Reconciliation Volume Allocation Run (R3) the Supplier Charge should be set at £0.00 and the RF charge kept at the current rate.

Further review of Supplier Charges

The Workgroup recommended that ELEXON and the Panel consider raising an Issue to review Supplier Charges should the Authority approve P300 and/or P272, which should include a review of the Supplier Charge of £0.00 at R1, R2 and R3; and the potential need to extend SP04 or create a similar PARMS Serial.

Views on sending of the D0010 instead of the D0036 and D0275

The Workgroup agreed with the proposal that the HHDC would send the D0010 data flow rather than the D0036 and D0275 data flows for the new Measurement Classes to the LDSO. The D0010 would be sent on a monthly basis and would be a cumulative register read.

During the initial discussions, a Workgroup member proposed to adopt the alternative solution proposed under P280, which gave Suppliers the option of also receiving the D0010 instead of the D0036 and D0275 but did not set out how the Supplier would inform the HHDC of its preference. When considering the Impact Assessment responses and the views from the Performance Assurance Board (PAB) on the risk of not specifying the method of instructing the HHDC of preference of data flow, the Proposer amended the proposed solution to remove the optionality for the Supplier. Therefore, the Supplier will receive the D0036 and D0275 data flows as per the current process. The Workgroup also agreed and decided not to raise an alternative with respect to this element of the solution. ELEXON advised that any Supplier that wished to receive the D0010 could potentially still do so under a bilateral arrangement with the HHDC outside of the BSC.

Views on changes to MRA DTC

The proposal sets out amendments to the D0040 and D0298 data flows to provide the necessary information to the SVAA, to include with the mapping information in the D0030 and D0298 data flow. The Workgroup wanted to ensure that the detailed solution is consistent with the aggregation of de-energised MSIDs in the NHH sector.

The Workgroup also believed that the D0036 and D0275 data flows need amending to ensure that the precision of the metering data to three decimal points is included in these data flows to allow the loading of data for MSIDs allocated to the new Measurement Classes. It also believed that the titles should be amended to reflect the widened scope, which would include HH aggregated data.

Further information on the proposed changes to the D0040 and D0298 can be found in the P300 Impact Assessment report; however, these are likely to be amended further outside of P300 and will be subject to the MRA DTC change process.

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Views on LLFC size and format

The Workgroup noted the Impact Assessment responses with respects to potential issues with the size and format of the LLFC number, which currently is 'nnn'. The Workgroup considered that potentially this could be amended to four or more numeric characters and/or use alphabetic characters, as there potentially could be an issue with the increase in the number of LLFCs following implementation of this change. The Workgroup concluded that it wasn't necessary to make these changes now, but it wanted to consult on this area in this assessment. A number of respondents to the Assessment Consultation identified that there would be an issue for them and it has also been identified that a separate DCP will increase the number of LLFCs used, meaning that the maximum possible number of LLFCs could become an issue for some LDSOs. The Workgroup therefore agreed that this should be flagged in the report and for ELEXON and Electralink to consider consequential changes.

Additional points raised by Assessment Consultation

Respondents to the P300 Assessment Consultations raised a number of points or questions, which the Workgroup considered. These are set out below with the Workgroup's views:

- Would there need to be changes to D0289 'Notification of MC/EAC/PC' and in particular the J0082 'Measurement Class Id'?

  The Workgroup felt that these would not be needed as the valid set for the J0082 is as defined within MDD, which will be updated.

- How would the CCC be communicated to the HHDA?

  The Workgroup noted that the HHDA would be in receipt of the D0209, which would include the Measurement Class and therefore the CCCs should be known.

- Would there need to be changes to the Electricity Central Online Enquiry Service (ECOES) and how will it handle the new Measurement Classes?

  The Workgroup noted that ECOES would not change, as this will be validated against SMRS and the new Measurement Classes once used in SMRS will be included in ECOES flows without the need to change that system.

- How will existing Measurement Class E sites be handled?

  The Workgroup noted that P300 is not mandating a change of Measurement Class; however, with DCP179, the expectation would be that to use the new aggregated tariffs the Supplier will want to consider migrating domestic HH Metering Systems to Measurement Class F and non-domestic WC Metering Systems to Measurement Class G.

- A point was made that the default Estimated Annual Consumption (EAC) currently applied to HH Metering Systems is based on the assumption that these are >100kW systems. The respondent asked whether it be more appropriate to introduce different values for each Measurement Classes.

  The Workgroup felt that this was worth investigating as a consequential change and should be highlight to the Supplier Volume Allocation Group (SVG) if P300 (and/or P272) is approved.

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- A respondent felt that there was a need for a considered approach to managing the migration to HH introduced by the wider suite of changes (P300, DCP179 and P272).

  The Performance Assurance Board (PAB) is already tasked with overseeing the migration plans under P272 under its remit under the Performance Assurance Framework (PAF). It is difficult to see how the voluntary migration of any Metering Systems on PCs 1 – 4 could be overseen, but certainly should these be mandated as HH in the future the PAB is likely to have a similar role in overseeing the migrations plans.

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Workgroups views on the Applicable BSC Objectives

The Workgroup has given its views on P300 against the Applicable BSC Objectives. These views have been captured below and a table summarising the views against each Applicable BSC Objective has been included at the end of this section.

Applicable BSC Objective (c)

The Proposer believes that P300 would better facilitate objective (c) as it accommodates a change raised within another Code that has a direct impact on that change's ability to deliver its objectives i.e. without a change to the BSC Systems and processes, the BSC prevents the improvement in competition being facilitated via another Code.

However, the majority of the Workgroup felt that whilst it understood the intent of this view, they believed that with no approved change in place this was not relevant. Therefore, they were neutral on this objective. The minority of Workgroup members agreed with the Proposer.

Applicable BSC Objective (d)

The majority of the Workgroup agreed with the Proposer that P300 would better facilitate objective (d) because it provides an efficient and cost effective mechanism to deal with a large increase in the volume of HH data without flooding Parties with Site Specific data resulting from the expansion of the HH market. Furthermore, the increased use of actual data from HH metering will provide industry-wide benefits through improvements in the accuracy of Settlement.

Summary of views against the Applicable BSC Objectives

The Workgroup majority view is that P300 does better facilitate the Applicable BSC Objectives and the Workgroup therefore recommends that P300 is approved.

The following table contains a summary of the Proposer's and the Workgroup's views against each of the Applicable BSC Objectives:

Does P300 better facilitate the Applicable BSC Objectives?		
Obj	Proposer's Views	Other Workgroup Members' Views[4]
(a)	• **Neutral –** no impact.	• **Neutral** – no impact.
(b)	• **Neutral –** no impact.	• **Neutral** – no impact.
(c)	• **Yes** – by accommodating DCP179's objectives with respects to improvement in competition.	• **Neutral (majority)** – no impact • **Yes (minority)** – agree with the Proposer.
(d)	• **Yes** – by providing an efficient and cost effective mechanism to	• **Yes (majority)** – agree with the Proposer.

[4] Shows the different views expressed by the other Workgroup members – not all members necessarily agree with all of these views.

What are the Applicable BSC Objectives?

(a) The efficient discharge by the Transmission Company of the obligations imposed upon it by the Transmission Licence

(b) The efficient, economic and co-ordinated operation of the National Electricity Transmission System

(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

(d) Promoting efficiency in the implementation of the balancing and settlement arrangements

(e) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency [for the Co-operation of Energy Regulators]

(f) Implementing and administrating the arrangements for the operation of contracts for difference and arrangements that facilitate the operation of a capacity market pursuant to EMR legislation

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Does P300 better facilitate the Applicable BSC Objectives?		
Obj	Proposer's Views	Other Workgroup Members' Views[4]
	manage the increase in the volume of HH data and facilitating the increased use of actual data from HH metering will deliver improvements in the accuracy of Settlement.	• **Neutral (minority)** – no impact.
(e)	• **Neutral** – no impact.	• **Neutral** – no impact.
(f)	• **Neutral** – no impact.	• **Neutral** – no impact.

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Panel's initial views on the Applicable BSC Objectives

The Panel **unanimously** agreed with the Workgroup's majority view that P300 **would** better facilitate Applicable BSC Objective (d). The views of the Panel are in line with the views of the Workgroup, as detailed in Section 7. One member had concerns about the implementation approach, and therefore did not agree that P300 should be approved. However, they did agree that it better facilitated Applicable BSC Objective (d).

Recommendations

The BSC Panel initially recommends the approval of P300.

Panel's views on draft legal text

The Panel unanimously agreed with the Workgroup's view that the proposed changes to the BSC and CSDs in Attachment A delivers the intention of P300.

Code Subsidiary Documents

A number of respondents to the Assessment Procedure Consultation commented that whilst the BSC changes deliver the intention of P300, they were unable to comment on the lower level changes as these had not been provided. Prior to the Panel meeting, a Panel Member sought confirmation that the Workgroup had addressed this, which ELEXON was able to confirm.

The DCP179 solution had not been finalised by the time of the P300 Assessment Procedure Consultation. Due to the interactions with DCP179, P300 solution could not be absolutely finalised. The DCP179 solution has subsequently been finalised and the P300 solution is therefore finalised. The Workgroup has since developed these CSD changes (included as an attachment to its Assessment Report to the Panel) and were included as part of the Report Phase Consultation.

Exceptions to this are the changes to the SVAA technical related documentation and the SVA Data Catalogue. These will be progressed as consequential changes if the Authority approves P300 and from the same point that the MRA DTC changes would also be progressed. This is the normal procedure for such consequential changes.

EDF comments on legal text

The Panel Member had also asked prior to the Panel meeting whether the Workgroup had addressed some specific comments on the legal text in EDF's consultation response. ELEXON confirmed that the Workgroup had addressed these comments. The Workgroup's considerations were as follows:

Requirement in Annex S-2 on LDSO to provide its mapping data to the Supplier

The Workgroup considered the suggestion of adding a provision that would have meant that the LDSO would provide its mapping data to the Supplier, but did not agree with the proposal.

If the Panel thought this needed further consideration then it would need to send P300 back into the Assessment Procedure, which would impact on the implementation approach for P300 and pre-P272 HH migration. The Panel did not deem this necessary and noted

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that a Party could raise a consequential Modification to introduce this provision if it thought it was needed.

Consequence of using same CCCs

The Workgroup considered EDF's concern that using the same CCCs for E, F and G would mean that the losses associated with these Measurement Classes would not be itemised in reporting, and a single GSP Group Scaling Weight would apply to total metered values and losses. However, the Workgroup accepted this and did not consider it a problem.

Clarification on whether P300 mandates which Measurement Class to use for HH

The Workgroup was aware that some respondents had interpreted that P300 would mandate which Measurement Classes to use for non-100kW HH Metering Systems. However, the Workgroup had determined that it did not do this. Nevertheless, the Workgroup did note that should a Supplier register a domestic (whether CT or WC metered) or non-domestic (WC metered) non-100kW Metering System as HH and it wanted to use the new DUoS tariffs, then DCP179 would require the Supplier to use the new Measurement Classes as appropriate.

This would also mean that any Metering Systems currently registered to Measurement Class E would need to migrate to the appropriate Measurement Class on the same rationale (that is, due to DCP179).

Addressing the issue of the number of LLFCs available

The Panel Member had also noted a response from an independent distribution network operator, which had noted that it could not support P300 without the issue of the number of LLFCs available being addressed. This issue is outside the scope of P300, but the Workgroup recognised that the P300 solution (along with other DCP changes) will mean that a consequential change will be required to address this LLFC issue. ELEXON will explore this with ElectraLink.

Panel's views on the proposed implementation approach

The majority of the Panel agreed with the implementation approach proposed by the Workgroup, as detailed in Section 5. However, one Panel Member did not agree with the implementation approach as they felt that there wasn't sufficient analysis on whether it was the right approach when considering the wider suite of changes being introduced by DCP179 and P272, particularly the period between P300 and P272 Implementation Dates when some migration will occur. The member felt that it might be possible for more time to be given for P300 implementation. Therefore, the Panel Member felt that they could not make an initial recommendation that P300 be approved without further analysis.

Another Panel Member noted that the PAB has been tasked with overseeing Supplier change of Measurement Class plans for P272. They noted that there are risks to Settlement associated with this activity and therefore it was important that sufficient time is provided for this activity. Therefore, they felt that reducing the amount of time between the implementation of P300 and P272 would increase the risk.

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The P300 Workgroup's implementation approach was primarily aimed at allowing the appropriate amount of time to implement P300. However, the Workgroup was mindful of the P272 proposed Implementation Date when determining the implementation approach for P300.

The Panel included additional questions within the Report Phase Consultation to better understand whether the implementation approach provides sufficient time for participants to migrate PC5-8 Metering Systems to HH should the Authority approve P272 for implementation on 1 April 2016. This was to seek views on the overall interactions of DCP179, P300 and P272. Further explanation on the interactions of DCP179 and P300 with P272 is included below.

Interactions of DCP179 and P300 with P272

The DCUSA and the BSC do not prevent the migration of NHH Metering Systems to HH. However, the industry has highlighted that the site specific HH DUoS tariffs are not reflective of actual use for some prospective HH Metering Systems. Therefore, this is perceived as a barrier to the migration to HH, whether mandated or otherwise. DCP179 provides for HH DUoS tariffs that are more reflective of use for domestic customers (with CT or WC metering) and non-domestic customers (with WC metering); and with P300, these will address this issue. The DCP179 Working Group's recommended Implementation Date is 1 April 2015.

If approved, P272 will mandate that PC5-8 Metering Systems are registered and settled as HH. The Panel consulted on an Implementation Date of 1 April 2016 for P272, the findings of which will be presented to the Panel at its meeting on 11 September 2014. The indicated lead time for implementing P272 is 13½ months. As such, the P272 implementation approach specifies 12 February 2015 as the last date when a decision can be made to meet the Implementation Date of 1 April 2016. Suppliers will therefore have at least 13½ months to migrate PC5-8 CT Metering Systems to HH.

From the P300 Implementation Date, non-domestic WC Metering Systems will be able to start migrating to Measurement Class G and utilise the new aggregated HH tariff. This therefore allows approximately five months (the period between P300 and P272 Implementation dates) for transitional migration before these sites will be mandated to be registered and settled on a HH basis, should both P272 and P300 be approved.

Suppliers may choose to migrate sooner, using Measurement Class E, but would not benefit from the new tariff for WC non-domestic Metering Systems. Any migration of WC non-domestic Metering Systems to E would have to migrate again to the new Measurement Class G once P300 is implemented to benefit from the new aggregated tariff.

Migration would need to be completed by the P272 Implementation Date, as P272 would make HH mandatory for PC5-8 Metering Systems.[5]

The below diagram sets out the interactions and lead times based on the decisions to approve each change being made on the first available respective cut-off date and the consequent Implementation Dates.

[5] Supply Licence Condition 12.22 sets out exception for where the Supplier is unable to install or arrange for the installation of any Advanced Meter despite taking all reasonable steps to do so.

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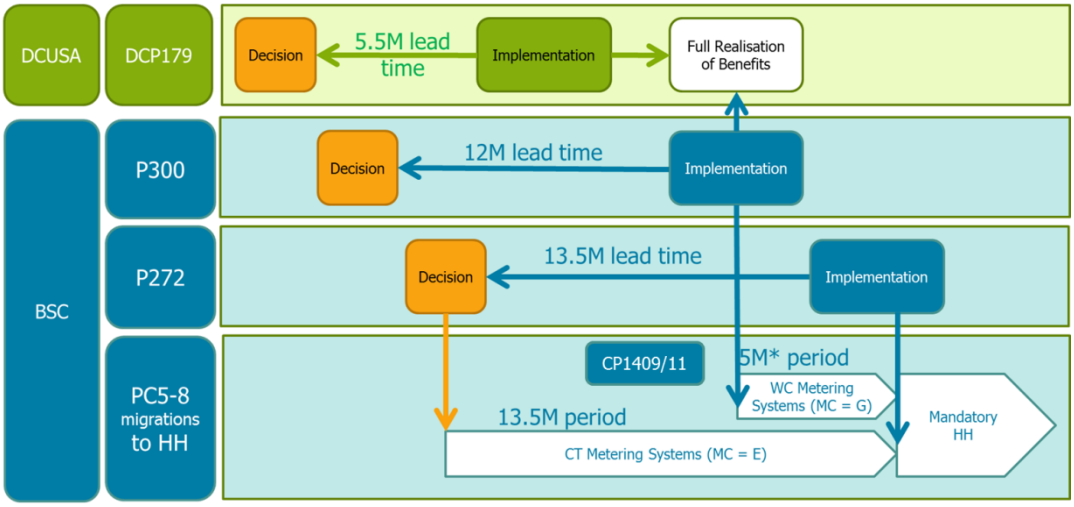
Diagram showing lead times & Implementation Date interactions



Note * 5M period results from time between P300 & P272 Implementation Dates

Note: CP1409 'Change of Measurement Class process for advanced Meters' and CP1411 'Remove exemption from Proving Tests for Code of Practice 10 Metering Systems' are further explained in section 9.

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9 Report Phase Consultation Responses

This section summarises the responses to the Panel's Report Phase Consultation on its initial recommendations. You can find the full responses in Attachment D.

Respondents' views on approval

All of the respondents to the P300 Report Phase Consultation agree with the Panel's initial majority recommendation that P300 should be approved

Summary of P300 Report Phase Consultation Responses			
Question	Yes	No	Neutral/ No Comment
Do you agree with the Panel's initial majority recommendation that P300 should be approved?	14	0	0
Do you agree with the Panel that the redlined changes to the BSC and CSDs deliver the intention of P300?	12	0	2
Do you agree with the Panel's recommended Implementation Date?	14	0	0
Do you have any further comments on P300?	3	11	0

Respondents' views against the Applicable BSC Objectives

All of the respondents to the P300 Report Phase Consultation agree with the Panel's initial majority recommendation that P300 should be approved. Eight of the 14 respondents provided comments to explain their reasoning for agreeing with the initial Panel's view that P300 should be approved. No new arguments were put forward. Some of the respondents indicated their support with respect to the Applicable BSC Objectives. Two supported the approval of P300, but disagreed with the views on the Applicable BSC Objectives. One respondent noted the significant impact on Suppliers but understood that P300 was necessary to realise the full benefit of DCP 179; however, did not indicate a view against the objectives.

Views against Applicable BSC Objective (c)

The Proposer still believes that P300 better facilitates objective (c) for the reasons explained in section 7 of this report. Another respondent also agreed with the Proposer's assessment against objective (c), stating that P300 would facilitate the promotion of competition by aiding the smart Meter roll out, as well as assisting the implementation of other changes.

Views against Applicable BSC Objective (d)

The Proposer and four other respondents agreed with the Panel's initial view that P300 would better meet objective (d), agreeing with the views on this set out in section 7 and 8 of this report.

One respondent disagreed with the views against objective (d). However, it appreciated that the industry requires P300 to implement P272 and therefore supported the approval of P300.

Another respondent agreed that P300 should be approved when P300 is considered as an enabler to DCP179. However, it does not believe that P300 addresses an existing defect

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within the BSC. It therefore does not believe that P300 better facilitates any of the objectives when considering the Modification as a standalone Modification against the baseline. It noted that its view is because the P300 solution has been designed only to enable DCP179 and the solution that that change implements. It is therefore concerned that the Panel has initially recommended approving P300 when, in its view, it does not better facilitate any of the objectives than the current baseline.

Respondents' views on the draft legal text and changes to the CSDs

Twelve of 14 respondents agree with the changes to the BSC and CSDs. One respondent is neutral and one respondent did not review these and therefore did not give a view.

Potential consequential change and clarification on use of the D0010 data flow

One of the 12 respondents that agreed with the changes suggested an amendment to the changes to BSCP502 3.4.2.9 footnote 30. It raised concerns that this does not work, noting that:

> "with interval data it is possible to rescale the data as each half-hourly interval has no reliance on the period coming before or after it (it is not cumulative) and as long as the rescaled period isn't retrieved from the meter after rescaling has occurred there will be no issue. With a register reading there is no physical change to the reading in the meter so if a reading was scaled up or down for the purposes of a dataflow, the next time a reading was taken directly from the meter the advance would be incorrect compared with the previous scaled reading."

The respondent later clarified the specific scenario, which may lead to the above. ELEXON discussed this with the Proposer, which confirmed:

- That LDSOs are only interested in what the Meter reading is at a set point of time each month as stated in the D0010. LDSOs would consider Meter Technical Details (MTD), along with any Meter multipliers, in order to determine the true consumption value. LDSOs are responsible for the CT data and any errors found would require new MTDs, and so they would know of any instances of incorrect CTs.
- The DUoS billing will use actual HH advances on an aggregated basis (provided by the HHDC to the HHDA and sent onward to the SVAA for inclusion in the D0030 data flow). The D0010 data flow would be used to aid validation and assist in network management, in preference to the D0036 or D0275 data flows due to privacy concerns.

Therefore, as the D0010 data flow will only be used by LDSOs for validation and any missing or incorrect values would not affect the HH aggregation of DUoS bills for these sites, ELEXON does not think that it is necessary to resolve this in the BSCP under P300. Nevertheless, ELEXON will look into this further and, if P300 is approved, will look to raise a CP if its conclusion is that BSCP502 does need further clarification regarding the use of D0010 data flows. The Implementation Date for any supporting CP if raised will be aligned with P300, so both would be implemented at the same time. The respondent was happy with this approach.

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Respondents' views on the proposed Implementation Date

All 14 respondents agreed with the implementation approach. Some provided comments, which noted the interactions with DCP179 and P272. These are explored further below. However, it is clear from the unanimous support for the Implementation Dates that they provide for sufficient time for implementation of P300 itself.

Respondents' views on the interactions and proposed implementation approaches between DCP179, P300 and P272

Two questions were asked in the Report Phase Consultation with respect to P300's interactions with DCP179 and P272. The questions covered the interactions and proposed implementation approaches for the three changes; and a question on the time between the Implementation Dates of P300 and P272. There was a lot of overlap in the responses. Therefore, responses to these two questions are presented together here.

Respondents felt that the DCP179 and P300 implementation approaches allowed sufficient time to implement these two changes. However, there was concern that if P300 were not implemented on 5 November 2015 but implemented later (due to an Authority decision approving P300 being made after 5 November 2014) then there would not be sufficient time to migrate PC5-8 Metering Systems by the proposed P272 Implementation Date of 1 April 2016. Respondents therefore encouraged the Authority to make its decision on all three related changes by 5 November 2014 to provide the maximum amount of time for implementing P272.

The Proposer felt that if the Authority could not make a decision by 5 November 2014, then there may be a need to look at other options. The Proposer suggested that if a decision was not made by 5 November 2014, then, either the P272 implementation should be delayed until June 2016; or Suppliers should be able to seek derogations to their licence obligations, but that this should include a migration plan based on a set of criteria around either customer contracts or MOA contract renewal dates.

One respondent felt that the Implementation Date for P272 shouldn't be determined until a decision on P300 has been made. One respondent felt that the P272 Implementation Date should be at least 12 months following the implementation of P300, allowing 12 months lead time to migrate PC5-8 WC Metering Systems to Measurement Class G, rather than the current five months. Another felt that this should be at least two years.

Some respondents felt that the P272 Implementation Date should be the start of migration, rather than the date by which PC5-8 Metering Systems should be compliant. However, there are different views as to the length of the period between the start of migration and the completion. Related to this idea, some feel that the migration should be tied to the lifespan of the contracts Suppliers have with each of their customers. That would mean that once a contract ended, the Metering System would need to migrate to HH.

Whilst understanding Suppliers' concerns, one respondent had concerns of their own over the potential to extend the period further because it would delay implementation further.

One respondent raised concern over the volume of change of Measurement Classes (CoMC), especially for the PC5-8 WC Metering Systems in some GSP Groups. Another respondent also noted that the CPs raised following Issue 49 'Change of Measurement Class (CoMC) process for Advanced Meters' have either been rejected or are yet to be

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implemented and which will have an impact on the CoMC activity. This was also discussed at the SVG's early September meeting (SVG163), where it was noted that:

- CP1409 'Change of Measurement Class process for advanced Meters' amends the CoMC process for advanced Meters, which would help with the CoMC process. However, this does not come into effect until 25 June 2015 as part of the June 2015 Release.
- CP1411 'Remove exemption from Proving Tests for Code of Practice 10 Metering Systems' introduces a requirement from 25 June 2015 as part of the June 2015 Release for MOAs to carry out Proving Tests for CoP10 Metering Systems, which would impact on the P272 migration, but may also impact on the rollout of smart Meters with respects to MOA resources.

There was support for a centrally co-ordinated and managed CoMC process to include all affected parties. This is already part of the PAB's strategy.

There was a concern raised that there will be an impact from Transmission Network Use of System (TNUoS) tariffs with the implementation of P272, which the respondent felt had not been considered.

A respondent believes that it is important that the tariffs and the PCs should be available beyond April 2016 to cater for sites that have failed to migrate.

Respondents' other views and comments on P300

The Proposer noted that the progression of DCP179 and P300 shows that both the DCUSA and BSC can work together and consider the impact each have on the other in developing changes.

However, one respondent thought that changes of this magnitude should not have been progressed through a series of separate changes. The respondent went on to say that more considerations are need with respects to expansion of capacity in the HH agent market and the impact on customers.

Another respondent believe that there will be unintended consequences from DCP179, P300 and P272. It noted that approximately 76,000 CT metered, non-domestic sites, which currently have aggregated tariffs, will move to site specific tariffs. However, the DCP179 Working Group developed its solution knowing that this would be the consequence.

The same respondent also believed that Measurement Class E will only be available for HH, CT metered customers. P300 does not mandate which Measurement Class should be used; however, DCP179 and P272 will require PC5-8 Metering Systems to be registered to Measurement Class E. This would not prevent WC Metering Systems being registered to Measurement Class E, but those that did would have a site specific DUoS charge. Therefore, Suppliers are likely to want to move any WC Metering Systems to the appropriate Measurement Class.

The respondent also asked what would happen to customers currently on Measurement Class C where demand has dropped and the customers would therefore no longer require mandatory HH metering under the 100kW requirement. Under the existing arrangements, these customer will be allowed to move to Measurement Classes A (NHH) or E. In addition, under P300 they could use new Measurement Classes F and G. The exception will be if P272 is approved. If the Meter has a Maximum Demand register and it is non-domestic, then it would fall under the criteria for P272 and would therefore need to be

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registered to E if a non-100kW CT Metering System or G if non-100kW WC Metering System.

Finally, the respondent raised that it was necessary to have clarity over Metering System level charges to provide certainty for customers.

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Recommendation

The BSC Panel recommends approval

Panel's final views on the Applicable BSC Objectives

The unanimous final view of Panel Members is that P300 would better facilitate Applicable BSC Objective (d). The views of these Members are in line with those previously expressed by Workgroup members (in Section 6) and Report Phase Consultation respondents (in Section 8) who felt P300 did better facilitate the Applicable BSC Objectives.

The Panel unanimously believes that P300 does better facilitate the Applicable BSC Objectives, and therefore recommends that P300 should be approved.

Panel's final views on Implementation Date

The Panel unanimously approved the implementation approach proposed by the Workgroup, as detailed in Section 5.

Panel's final views on legal text

The Panel unanimously approved the proposed changes to the BSC and CSD for P300, which can be found in Attachment A.

Panel's views on lead times between P300 and P272

Noting that the period between the P300 Implementation Date (5 November 2015) and P272 Implementation Date (1 April 2016) would leave only approximately five months to migrate PC5-8 WC Metering Systems to HH, a Panel Member enquired as to whether industry would be able to meet the implementation dates. The Panel wanted to ensure that the industry has as much time as possible. The responses to the P272 and P300 consultations indicate mixed views on migrating these WC NHH Metering Systems to HH within this period. The Authority should therefore consider also reviewing P300 consultation responses when making its decision on P272.

A Panel Member asked whether there were any particular Suppliers that would be impacted more than others. It was noted that there were two Suppliers that had a greater proportion of the PC5-8 Metering Systems and that some GSP Groups had a greater proportion of these. ELEXON had spoken with some SMRAs, which either didn't have a problem on the volume of migration or, in the case of one SMRA, was comfortable processing 20,000 CoMC events per distribution area per day (this is the total volume it can manage, and not per Supplier).

Another Panel Member noted that the consequence of a Supplier not being fully compliant with P272 was that it would enter into Error and Failure Resolution (EFR) overseen by the PAB,. This would mean that a Supplier in EFR would need to submit plans to ELEXON on how it proposed to become compliant and by when; and ultimately, the matter could be escalated to the PAB.

It was noted that the PAB will oversee Suppliers' migration plans, but would not have the power to enforce these. It was also noted that these plans will be live, so would change as Suppliers lost and gained sites. ELEXON will be discussing this with the PAB at its meeting in October. A Panel Member suggested that the Panel could provide some oversight on

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this, receiving monthly updates from the PAB, to add its weight of authority to the PABs. The Panel agreed to this.

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11 Recommendations

The BSC Panel recommends to the Authority:

- That P300 should be **approved**;
- An Implementation Date for P300 of:
  - 5 November 2015 if an Authority decision is received on or before 5 November 2014; or
  - 25 February 2016 if an Authority decision is received after 5 November 2014 but on or before 25 February 2015; and
- The BSC legal text and CSD redlined changes for P300.

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Appendix 1: Workgroup Details

Workgroup's Terms of Reference

Specific areas set by the BSC Panel in the P300 Terms of Reference
What has changed since the Authority's decision on P280?
What are the expected impacts and benefits associated with P300 (where not already covered by DCP179)?
What is the interaction with DCP179 and the DCUSA?
Are the Measurement Classes and CCCs identified by P300 appropriate?
What should the Performance Standards be for the new Measurement Classes?
What is the impact on Supplier Charges?
What changes are needed to BSC documents, systems and processes to support P300 and what are the related costs and lead times?
What changes are required to MRA DTC and any other industry Codes?
Are there any Alternative Modifications?
Does P300 better facilitate the Applicable BSC Objectives than the current baseline?
What should the implementation approach be for P300?

Assessment Procedure timetable

P300 Assessment Timetable	
Event	Date
Present Initial Written Assessment to Panel	20 Mar 14
Workgroup Meeting	11 Apr 14
Workgroup Meeting	01 May 14
Impact Assessment (15 Working Days)	09 – 30 May 14
Workgroup Meeting	09 Jun 14
Assessment Procedure Consultation (15 Working Days)	23 Jun – 11 Jul 14
Workgroup Meeting	W/B 21 Jul 14
Present Assessment Report to Panel	14 Aug 14

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Workgroup membership and attendance

P300 Workgroup Attendance							
Name	Organisation	11 Mar 14	01 May 14	09 Jun 14	23 Jul 14	28 Jul 14	30 Jul 14
Members							
David Kemp	ELEXON *(Chair)*	✓	✓	✓	✓	✗	✗
Simon Fox	ELEXON *(Lead Analyst and Vice Chair)*	✓	✓	✓	✓	✓	✓
John Lawton	ENWL *(Proposer)*	✓	☎	✓	✓	☎	☎
Julie McMillan	IMServ	✓	✗	✗	✗	✗	✗
Ian Hall	IMServ	✗	✗	✓	✓	☎	☎
Peter Waymont	UK Power Networks	✗	✗	✓	✓	✗	✗
Tracey Pitcher	Western Power Distribution	✓	☎	✗	✓	✗	☎
Walter Hood	IBM (on behalf of Scottish Power)	✓	✗	✓	✓	☎	☎
Ben Fuller	Centrica	✓	☎	✓	✓	☎	☎
Steven Bradford	Flow Energy	✓	✗	✓	✓	☎	☎
Haydn Wyllis	SSE	✓	☎	✓	✓	☎	☎
Helen Boothman	TMA	✗	☎	✓	✓	✗	✗
Philip Russell	Independent Consultant	✓	☎	✓	✓	✗	✗
Anika Brandt	SSEPD	✓	☎	✓	✓	☎	☎
Andrew Enzor	Northern Powergrid	✓	✗	✓	✓	☎	☎
Chris Ong	UK Power Networks	✓	✗	✓	✗	☎	☎
Dave Smith	Npower	☎	✗	✓	✓	✗	✗
Julia Haughey	EDF Energy	✓	☎	✓	✓	☎	☎
Rachael Burn	E.ON	✗	✗	✓	✓	✗	✗
Attendees							
Jonathan Priestley	ELEXON *(Design Authority)*	✓	✓	✓	✗	✗	✗
Matthew McKeon	ELEXON *(Design Authority)*	✗	✗	✗	✓	✓	✓
Tina Wirth	ELEXON *(Legal)*	✓	✓	✓	✗	✗	✓
Bethany Hanna	Ofgem	✓	✗	✗	✓	✗	☎
Johnny Amos	Ofgem	✓	✗	✗	✗	✗	✗
Tim Parry	St. Clements Services Ltd	✓	☎	✓	✗	✗	✗
Swetta Coopamah	Centrica	✓	✗	✗	✗	✗	✗
Rachael Mottram	Gemserv	✓	✗	✗	✓	✗	✗
Dan Hickman	Npower	✗	☎	✗	✗	✗	✗
Greg Mackenzie	Centrica	✗	✗	✗	✗	☎	✗

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P300 Workgroup Attendance							
Name	Organisation	11 Mar 14	01 May 14	09 Jun 14	23 Jul 14	28 Jul 14	30 Jul 14
David Collins	CGI	✓	✗	✗	✗	✗	✗
Ganesh Senthil Kumar	Cognizant	✓	✓	✗	✗	✗	✗

ELEXON also provided Workgroup communications to DCUSA and MRA Code Administrators to ensure that those organisations were aware of the progression of P300.

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Appendix 2: Estimated Progression Effort

The following tables contain the estimated effort in progressing P300:

Assessment Effort	
Participant	Effort (man days)
ELEXON	79
Workgroup members	174
Total	**251**

Consultation Response Effort	
Consultation	No. of responses
Industry Impact Assessment	19
Assessment Procedure Consultation	17
Report Phase Consultation	14
Total	**50**

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Appendix 3: Glossary & References

Glossary of defined terms

Acronyms and other defined terms used in this document are listed in the table below.

Glossary of Defined Terms	
Acronym	Definition
AMD	BSC Application Management and Development
BSC	Balancing and Settlement Code
BSCCo	BSC Company
BPO	Business Process Outsourcing
CCC	Consumption Component Class
CoP	Code of Practice
CP	Change Proposal
CT	Current Transformer
CDCM	Common Distribution Charging Methodology
DCMF	Distribution Charging Methodologies Forum
DCP	DCUSA CP
DCUSA	Distribution Connection and Use of System Agreement
DTC	Data Transfer Catalogue
DUoS	Distribution UoS
ECOES	Electricity Central Online Enquiry Service
EFR	Error and Failure Resolution
HH	Half Hourly
HHDA	HH Data Aggregator
HHDC	HH Data Collector
HHMOA	HH Meter Operator Agent
LDSO	Licensed Distribution System Operator
LLF	Line Loss Factor
LLFC	LLF Class
MDB	MRA Development Board
MDD	Market Domain Data
MRA	Master Registration Data
MSID	Metering System ID
MTDs	Meter Technical Details
NHH	Non Half Hourly
PAB	The Performance Assurance Board
PAF	Performance Assurance Framework

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Glossary of Defined Terms	
Acronym	Definition
PARMS	Performance Assurance Reporting and Monitoring System
PC	Profile Class
R1	First Reconciliation Volume Allocation Run
R2	Second Reconciliation Volume Allocation Run
R3	Third Reconciliation Volume Allocation Run
RF	Final Reconciliation Volume Allocation Run
SSC	Standard Settlement Configuration
SME	Small and Medium Enterprise
SMRA	Supplier Meter Registration Agent
SMRS	Supplier Meter Registration Service
SP04	PARMS Serial SP04 Installation of HH Metering
SP08c	PARMS Serial SP08c Percentage of non-mandatory HH Energy Settled on Actual Readings
SVAA	Supplier Volume Allocation Agent
SVG	Supplier Volume Allocation Group
TPR	Time Pattern Regime
UoS	Use of System
WC	Whole Current

DTC data flows and data items

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

DTC Data Flows and Data Items	
Number	Name
D0010	Meter Readings
D0030	Non Half Hourly DUoS Report
D0036	Validated Half Hourly Advances for Inclusion in Aggregated Supplier Matrix
D0040	Aggregated Half Hour Data File
D0209	Instruction(s) to Non Half Hourly or Half Hourly Data Aggregator
D0242	Supercustomer DuoS Daily Statement
D0275	Validated Half Hourly Advances
D0289	Notification of MC/EAC/PC
D0298	BM Unit Aggregated Half Hour Data File
D0314	Non Half Hourly Embedded Network DUoS Report
D0315	Embedded Network Supercustomer DUoS Daily Statement
J0066	GSP Group Id

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DTC Data Flows and Data Items	
Number	Name
J0082	Measurement Class Id
J0084	Supplier Id
J0147	Line Loss Factor Class Id
J0160	Consumption Component Class Id
J0189	Distributor Id

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
1, 3, 5	DCP179	http://www.dcusa.co.uk/Public/CP.aspx?id=201
1, 4	Rejected Modification P280	http://www.elexon.co.uk/mod-proposal/p280-introduction-of-new-measurement-classes/
4	DCP103 'DUoS Charges for sub 100kw HH settled sites'	http://www.dcusa.co.uk/public/cp.aspx?id=123
5	Authority direction to the Panel to consult again on the Implementation Date of P272	https://www.ofgem.gov.uk/publications-and-updates/balancing-and-settlement-code-bsc-p272-direction-bsc-panel-consult-revised-implementation-date-p272
4	DCP151 'HH Aggregated tariffs'	http://www.dcusa.co.uk/Public/CP.aspx?id=161
5	P272 'Mandatory Half Hourly Settlement for Profile Classes 5-8'	http://www.elexon.co.uk/mod-proposal/p272-mandatory-half-hourly-settlement-for-profile-classes-5-8/
8	P300 webpage	http://www.elexon.co.uk/mod-proposal/p300/
28	Issue 49 webpage	http://www.elexon.co.uk/smg-issue/issue-49-change-of-measurement-class-comc-process-for-advanced-meters/
29	SVG163 webpage	http://www.elexon.co.uk/meeting/svg-163/
25, 29	CP1409 webpage	http://www.elexon.co.uk/change-proposal/cp1409/
25, 29	CP1411 webpage	http://www.elexon.co.uk/change-proposal/cp1411/

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