

P317 'Changes to the Unmetered Supplies obligations in the BSC'

BSC Section S provides details of the Unmetered Supply (UMS) arrangements and obligations. Recent changes to the responsibilities of Licence Distribution System Operators (LDSOs) and the Party Agent role of Meter Administrator (MA) mean that some of the wording in BSC Section S relating to UMS is outdated. P317 therefore seeks to remove this outdated wording and better align the BSC with current working practice.

This Report Phase Consultation for P317 closes:

5pm on Friday 13 March 2015

The Panel may not be able to consider late responses.



The BSC Panel initially recommends **approval** of P317

This Modification is expected to impact:

- Licence Distribution System Operators
- Meter Administrators



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About This Document

This is the P317 Draft Modification Report, which ELEXON is issuing for industry consultation on the BSC Panel's behalf. It contains the Panel's provisional recommendations on P317. The Panel will consider all consultation responses at its meeting on 9 April 2015, when it will agree a final recommendation on whether or not the change should be treated as a Self-Governance Modification and if it should be approved or rejected.

There are three parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, benefits, drawbacks and proposed implementation approach.
- Attachment A contains the draft redlined changes to the BSC for P317.
- Attachment B contains the specific questions on which the Panel seeks your views. Please use this form to provide your responses to these questions, and to record any further views/comments you wish the Panel to consider.

P317
Report Phase Consultation

20 February 2015

Version 1.0

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Why Change?

BSC Section S provides details of the UMS arrangements and obligations. Recent changes to the responsibilities of LDSOs and MAs mean that some of the wording in BSC Section S relating to UMS is outdated and no longer needed.

Solution

This Modification seeks to remove redundant text from the BSC relating to the UMS arrangements.

Impacts & Costs

No implementation impacts are anticipated on BSC Parties or Party Agents. However, there may be some impacts, which are not directly required for implementation of P317, on LDSOs and MAs, if their internal documentation needs to be updated.

Implementation

The Panel recommends an Implementation Date for P317 of **25 June 2015**, as part of the June 2015 BSC Release.

Recommendation

The Panel initially recommends that P317 should be approved as a Self-Governance Modification.

2 Why Change?

What is an Unmetered Supply?

An [Unmetered Supply](#) (UMS) is any apparatus that draws a current and is connected to the Distribution Network without a Meter recording its energy consumption. UMS exists in the Half Hourly (HH) and Non-Half Hourly (NHH) Supplier Volume Allocation (SVA) markets.

Details of the UMS processes and obligations are contained in [BSC Section S 'Supplier Volume Allocation'](#) and BSC Procedure 520 (BSCP520) ['Unmetered Supplies Registered in SMRS'](#).

What is an Equivalent Meter?

An Equivalent Meter (EM) means, in relation to a UMS, the hardware and software that is used to calculate the HH consumption of electricity associated with a UMS.

There are two types of EM:

- passive Meters, which allocate the unmetered consumption across HH periods by looking at the mathematical relationship between annual burning hours compared to the daily time of sunrise and sunset; and
- dynamic Meters, which allocate the unmetered consumption across HH periods by referencing the operational number of Photo Electric Cell Unit Array (PECUs), or by making use of actual switching times reported by a Central Management System (CMS)¹.

What is the issue?

The P317 Proposer has identified issues with wording in BSC Section S relating to the UMS arrangements. Recent changes to the responsibilities of LDSOs and MAs, in relation to UMS, means that some of the wording in Section S is now outdated and redundant.

The P317 Proposer therefore seeks to remove this outdated wording and better align the BSC with current working practice (the lower level details of which are already detailed in BSCP520).



What is a Photo Electric Cell Unit Array?

A PECU Array is the device, containing approximately 30 PECUs that the MA contacts to ascertain the local switching times for certain HH UMS customers.

¹ Central Management Systems, also known as telemanagement, are the next step in remote dynamic street lighting control.

Proposed solution

P317 'Changes to the Unmetered Supplies obligations in the BSC' was raised by Electricity North West on 8 January 2015. This Modification seeks to remove redundant text from the BSC relating to the UMS arrangements.

P317 proposes to remove paragraphs 8.2.7 – 8.2.10 inclusive from BSC Section S as they are now outdated for the following reasons:

- **8.2.7** – *“Upon request by a Supplier or the Panel, a Licensed Distribution System Operator shall notify it in writing of one or more Equivalent Meters to be used on its Distribution System or Associated Distribution System for the purpose of calculating consumption associated with an Equivalent Unmetered Supply.”*
 - Paragraph 8.2.7 is now outdated as current working practice allows the UMS Operator (UMSO)² to specify dynamic or passive trading on a Metering System Identifier (MSID) by MSID basis (as detailed in BSCP520). The UMSO is responsible for looking after all of the UMS on its Network.
- **8.2.8** – *“A Licensed Distribution System Operator shall be entitled to change its nomination of an Equivalent Meter from time to time provided that it gives at least one year’s prior written notice of such change to the Panel.”*
- **8.2.9** – *“The Panel shall, on request by a Supplier, provide details of the Equivalent Meter used or to be used by a Licensed Distribution System Operator, as notified to the Panel by that Licensed Distribution System Operator pursuant to paragraph 8.2.7 and 8.2.8.”*
 - Paragraphs 8.2.8 and 8.2.9 are no longer required as the EM is part of the MA’s qualified system and therefore not determined by the LDSO. BSCP520 also sets out that the BSC Panel approves EMs. If requested, the UMSO shall advise the Panel of the EMs to be used on its Distribution System, and will provide 1 year’s written notice to the Panel if the EM is to be changed. The Panel will provide details of the EM used by an UMSO to a Supplier if requested.
- **8.2.10** – *“If an Equivalent Meter requires one or more photo electric cell unit arrays to function properly, then the Licensed Distribution System Operator which nominated the Equivalent Meter shall agree with any relevant Supplier the location(s) of such photo electric cell unit array(s).”*
 - Paragraph 8.2.10 is now outdated as current working practice, detailed in BSCP520, has been changed to clarify the responsibilities for agreeing the location of PECU Arrays.

Legal text changes

Full details of the draft legal text changes to BSC Section S for P317 can be found in Attachment A.

² The UMSO is part of the LDSO, also known as the Distribution Business or Network Operator. The UMSO is responsible for looking after all of the Unmetered Supplies on its Network. The UMSO makes new connections and decides what equipment is suitable for treatment as an Unmetered Supply. The UMSO provides a summarised inventory to the MA for Half Hourly traded UMS or calculates an Estimated Annual Consumption (EAC) for Non Half Hourly traded UMS.

4 Impacts & Costs

Estimated central implementation costs of P317

The central implementation costs for P317 are minor and equate to approximately £240 (one man day) for ELEXON to implement the required changes to BSC Section S.

Indicative industry costs of P317

There are no impacts on BSC Parties or Party Agents to implement P317. We therefore do not anticipate any industry costs to be incurred to implement the Modification should it be approved.

Report Phase Consultation Questions

Will P317 impact your organisation?

Will your organisation incur any costs in implementing P317?

The Panel invites you to give your views using the response form in Attachment B

P317 impacts

Impact on BSC Parties and Party Agents

No implementation impacts anticipated on BSC Parties or Party Agents. However, there may be impacts on LDSOs and Mas not directly required for implementation if internal documentation needs to be updated to reflect the removal of paragraphs by P317.

Impact on Transmission Company

We do not anticipate an impact on the Transmission Company.

Impact on BSCCo

ELEXON will be impacted through the implementation of the changes to BSC Section S.

Impact on BSC Systems and processes

There are no impacts on BSC Systems or processes.

Impact on Code

| Code Section | Potential Impact |
|--------------|---|
| Section S | Changes will be required to implement P317. |

Recommended Implementation Date

The Panel initially recommends an Implementation Date for P317 of:

- **25 June 2015**, as part of the June 2015 BSC Release.

There are no participant or system impacts anticipated as P317 only seeks to remove text from the BSC that is no longer required. Therefore implementation of this Modification in June 2015 is appropriate as very little lead time is required.

6 Panel's Initial Discussions

Panel's consideration of the proposed progression

The Panel initially unanimously agreed with the recommendation that P317 should be treated as a Self-Governance Modification Proposal as it has no material impact on:

- consumers;
- competition;
- the Transmission System; and/or
- BSC governance.

The Panel noted that there are no implementation impacts to Parties or Party agents anticipated as the Modification only seeks to remove wording from BSC Section S that is now outdated and redundant. The Panel therefore unanimously agreed that P317 should be sent directly into the Report Phase.

Report Phase Consultation Question

Do you agree with the Panel's initial view that P317 should be treated as a Self-Governance Modification?

The Panel invites you to give your views using the response form in Attachment B

Implementation approach

The Panel initially unanimously agreed with the recommended Implementation Date for P317 of:

- **25 June 2015** as part of the June 2015 BSC Release.

Report Phase Consultation Question

Do you agree with the Panel's recommended Implementation Date?

The Panel invites you to give your views using the response form in Attachment B

Legal text changes

The Panel initially unanimously agreed that the draft legal text changes to BSC Section S deliver the intention of P317. Full details of the proposed legal text changes can be found in Attachment A.

Report Phase Consultation Question

Do you agree with the Panel that the redlined changes to the BSC deliver the intention of P317?

The Panel invites you to give your views using the response form in Attachment B

Panel's initial views against the Applicable BSC Objectives

The Panel initially unanimously agreed with the Proposer's view that P317 would better facilitate Applicable BSC Objective (d), for the reasons set out below:

- **Objective (d):** P317 seeks to remove redundant text from the BSC relating to the UMS arrangements which have not been updated since the obligations on LDSOs and the Party Agent role of MA were changed in BSCP520. Removing this outdated text promotes efficiency in the implementation of the balancing and settlement arrangements.

The Panel therefore initially unanimously recommends that P317 be approved as a Self-Governance Modification Proposal.

Report Phase Consultation Question

Do you agree with the Panel's initial unanimous recommendation that P317 should be approved?

The Panel invites you to give your views using the response form in Attachment B

7 Recommendations

The BSC Panel initially recommends to the Authority:

- That P317 should be treated as a Self-Governance Modification Proposal;
- That P317 should be **approved**;
- An Implementation Date for P317 of:
 - 25 June 2015; and
- The draft BSC legal text for P317.

Appendix 1: Glossary & References

Acronyms

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

| Acronym | |
|---------|---|
| Acronym | Definition |
| BSCP | Balancing and Settlement Code Procedure |
| CMS | Central Management System |
| EM | Equivalent Meter |
| HH | Half Hourly |
| LDSO | Licensed Distribution System Operator |
| MA | Meter Administrator |
| MSID | Metering System Identifier |
| NHH | Non Half Hourly |
| OID | Operational Information Document |
| PECU | Photoelectric Cell Unit |
| SVA | Supplier Volume Allocation |
| UMS | Unmetered Supply |
| UMSO | Unmetered Supply Operator |

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 |
| 3 | Unmetered Supplies webpage | https://www.elexon.co.uk/reference/technical-operations/unmetered-supplies/ |
| 3 | BSC Sections webpage | https://www.elexon.co.uk/bsc-related-documents/balancing-settlement-code/bsc-sections/ |
| 3 | BSCP webpage | https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/6/?show=10&type=class |
| 3 | UMSUG webpage | https://www.elexon.co.uk/group/unmetered-supplies-user-group-umsug/ |
| 3 | SVG webpage | https://www.elexon.co.uk/group/supplier-volume-allocation-group-svg/ |
| 3 | OID webpage | https://www.elexon.co.uk/reference/technical-operations/unmetered-supplies/charge-codes-and-switch-regimes/ |
| 5 | P317 webpage | https://www.elexon.co.uk/mod-proposal/53172/ |