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Code Drafting Consultation Advisory Notes - BSC/REC Mop Up 2/Final Review and Elexon and DCUSA Consequential Change

Version 1.0

MHHS DEL2308

The Code Workstream has produced multiple Code Artefacts across the Balancing settlement Code (BSC), Retail Energy Code (REC), Consequential Code Change from Elexon Assurance changes and Distribution Connection and Use of System Agreement (DCUSA) for industry final review and consultation comment.

This consultation process seeks to confirm that the Design Artefacts (MHHS Version 5.0, plus amendments up to Interim Release 7 and Elexon Assurance Design) have been, where relevant, correctly translated into the Code Artefacts.

Review feedback should consider whether the code drafting reflects the MHHS Design (Version 5.0 and up to IR7 amendments) and for Elexon assurance reflects the assurance Design.
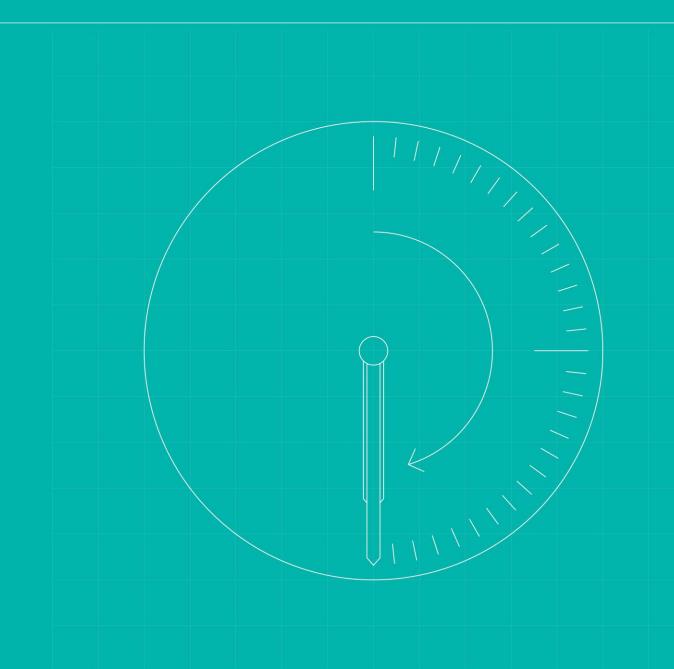- If you feel it does not, please submit your feedback by downloading the **Code Artefacts Consultation Comments** from the Mop Up Code collaboration base page.
- If you feel the Code could better reflect the MHHS Design, please respond with improved wording
- If you spot a minor change or typo, please respond Code@mhhsprogramme.co.uk

All documents are either new clean versioned artefacts or redlined versions.

The Design solution is baselined through the Design Workstream and does not form part of the Code Drafting Consultation. Any comments relating to the MHHS Design must be directed to design@mhhsprogramme.co.uk

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Consultation Advisory Notes

February Consultation Activity (Mop-up 2 and Final Review)

The February consultation will include -

1. BSC artefacts will be updated to include IR7 – low impact

2. REC artefacts will be updated to include IR7 – medium impact on interfaces and wider REC drafting

3. BSC Consequential Code Change (Assurance) delivery – medium change impact

4. DCUSA Consequential Code Change delivery – low change impact

5. A final review of all published Code Artefacts – high volume

Please note

- The BSC Sections (item 1 & 3 above) are combined to include both MHHS Programme and Elexon Assurance text in each (requested by PAB)

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February Consultation Matrix

- The final review includes a lot of artefacts to review.

- To support participants, artefacts are split into folders on the Collaboration Base.
  - BSC Sections, BSCPs (700-709 series), Other BSCPs, Elexon Assurance BSCPs and DCUSA, Retail Energy Code (REC).

- A matrix can be found via the quick links and also on the Website which adds more detail for BSC Code Artefacts:
  - The artefacts title
  - T-shirt sizing' for scale of change
  - Consultation folder
  - Main impacted party

We request that all parties review the codes which are relevant to them and consider the cross code artefact impacts to other code party artefacts, plus impacts across impacted codes.

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To submit your feedback, please download the Code Artefacts Consultation Comments from the Mop Up 2 Code consultation page. Save the spreadsheet with a file name that includes the short name of your organisation. Once completed, please email the spreadsheet to code@mhhsprogramme.co.uk.

Consultation questions:

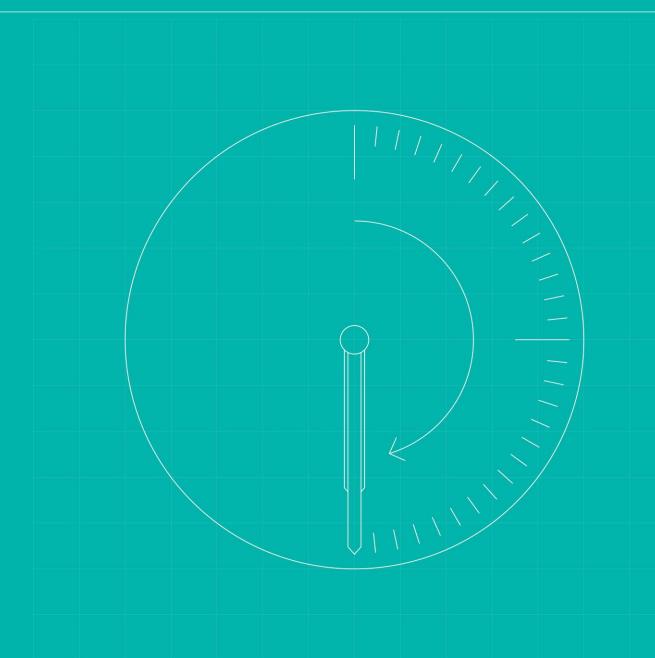| Column Header	Guidance Note	Field Type	Field Requirement
Code Artefact Name	Choose the Code Artefact that you're reviewing from the drop-down list	Drop-down menu	Mandatory
Document Section	Include the section for which your comment is related to e.g. paragraph 4.1	Free text	Mandatory
Comments	Provide the comment you have in relation to the document you are reviewing e.g. CSS (or CCS in document) is referred to as Actor but no interaction with CSS in business process	Free text	Mandatory
Related Design Artefact	If your comment relates to a Design Artefact, please ensure you include the name of the Artefact e.g. MHHSP-BPD002	Free text	Optional
Related Design Artefact Section/Step	If your comment relates to a Design Artefact, please ensure you include the relevant section or step in the Artefact	Free text	Optional
Suggested Change	For example, propose new wording	Free text	Mandatory
Comment Owner	Provide your name as the comment owner	Free text	Mandatory
Organisation	Provide the name of your organisation	Free text	Mandatory
Constituency	Provide the name of your constituency	Free text	Mandatory

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Review Stage	What happens in the review stage?	What do I need to do as a participant?
1. Comment Triage & Resolution	• Comments will be reviewed and allocated to a triage category • Code Issues will be identified and prioritised • Comment responses will be updated to provide the rationale and/or the proposed change	• Comment Owners to provide further information on comment if required • Comment Owners to be available to discuss comments directly if required
2. Comment Response Review	• Comment responses will be published onto the Collaboration Base and through the CDWG papers • Code drafting will be presented to CDWG for participant feedback and review following open consultation with industry parties • CDWG will review the comments and issues raised through drafting and determine any changes or additions to code drafting • CDWG review activities will be presented to CCAG for consideration as to whether code drafting can be approved in principle before the final consultation	• Review comment responses and proposed changes • Review CDWG meeting materials and provide feedback before the meeting • Attend CDWG meetings to contribute to comment discussions
3. Agree consensus	• Where there is not consensus across industry parties, comments will be identified and entered into the Dissensus process • Comment owners will be contacted to raise a Dissensus Form • Dissensus Issues will be discussed in the Dissensus forum	• Comment Owners to complete Dissensus Form, summarising their position and providing rationale and associated materiality • Comment Owners to present their position at the Dissensus forum for discussion • Industry Participants to attend the Dissensus forum to agree decision on Dissensus items
4. Cross-Code Advisory Group (CCAG) (assurance)	• Oversee central coordination, monitoring and management of code changes • Review and action work carried out by CDWG • Manage, consult and approve recommended decisions from CDWG	• Provide feedback to your Constituency Representative for discussion at CCAG. Please note that any code drafting questions should be raised at CDWG

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Balancing and Settlement Code (BSC) Code Artefacts

BSC Code Artefacts will be organised in logical groups:

- **BSC Sections** - redlined changes tracked against current BSC Baseline *for MHHS Design and Assurance*

- **New MHHS BSCPs (700-709)** - tracked to show all amendments since last CCAG approval

- **Other BSCPs** - redlined changes tracked against the current BSC Baseline

- **Assurance BSCPs** - redlined changes tracked against the current BSC Baseline

- (Note Elexon, DCUSA and and REC Code Artefacts will be hosted in their separate folders)
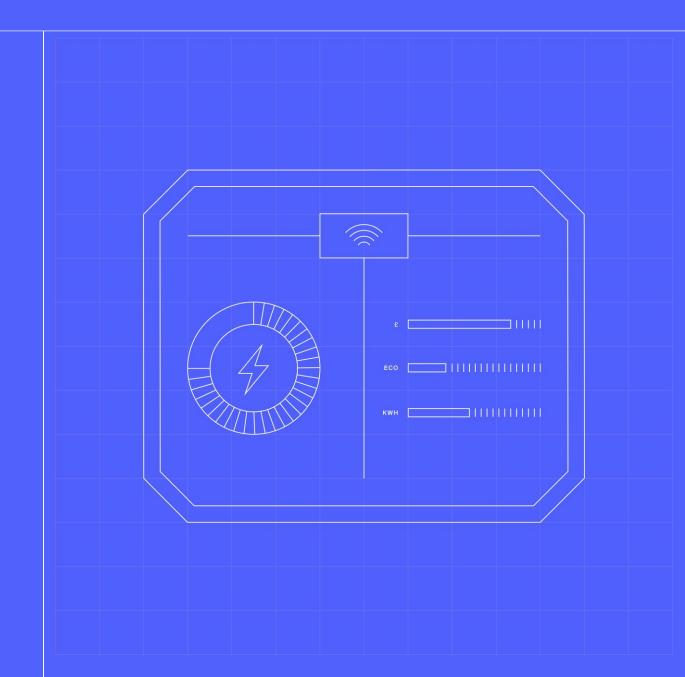
Changes made to BSC Code Artefacts:

- Addressed all comments received as part of Mop-Up 1 industry consultation

- Programme design updates up to IR7 plus approved CR24/25 (as agreed by CCAG)

- Added commentary to PSL200 to show where non-function requirements will sit if it is withdrawn

- Updated Defined Terms (X-1 and X-2) to cover all MHHS Code artefacts issued up to Mop-Up 2

Still ongoing:

- Requirements mapping and associated traceability between MHHS Code Drafting and DIP Rules (Issue 101) is being carried out, will be delived as part of the Finalisation and Consistency Check stage

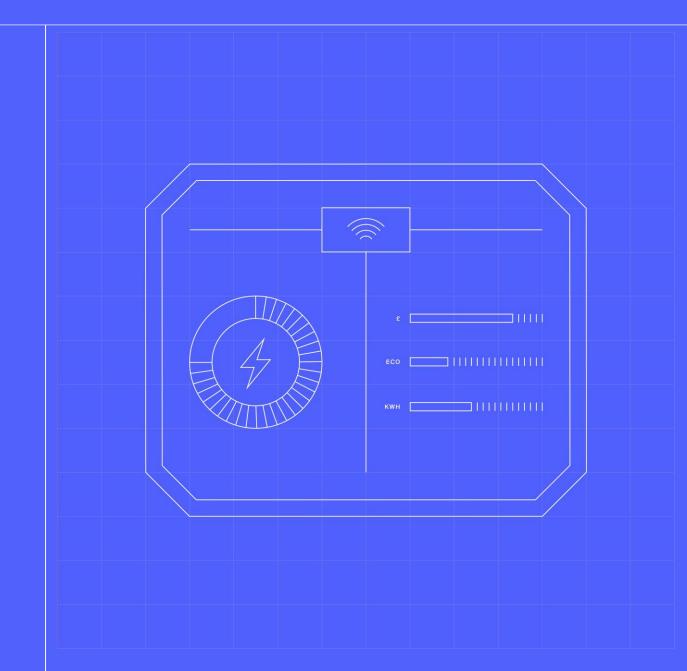# Retail Energy Code (REC) Code Artefacts

February Consultation Activity (Mop-up 2 and Final Review)

There are 21 documents within scope for the MHHS changes required for the REC.

Further information to support the consultation can be found here: Collaboration Base or Website

Elexon Assurance
Code Artefacts

Code Drafting Changes for the **Performance Assurance Framework**

Elexon have made changes to the BSC Sections and BSC Procedures (BSCP) governing the **Performance Assurance Framework** for MHHS implementation.

These include:

- Housekeeping changes to align with MHHS terminology, process and roles

- Changes to Performance Assurance Techniques supported by high level principle documents as discussed with the Performance Assurance Working Group

- For relevant techniques, high level design principle documents can be found here

- Participants are requested to ensure the Elexon assurancvce Code Aretafcts correctlty translate the Performance Assurance design principle documents

Code Drafting Changes for the **Performance Assurance Framework**

We've have made changes to the BSC Sections and BSC Procedures (BSCP) governing the **Performance Assurance Framework** for MHHS implementation.

These changes including amending:

- Section Z: housekeeping updates to include new MHHS / Performance Assurance Parties

- Section X: housekeeping updates to include new MHHS Performance Assurance terminology

- BSCP27: housekeeping updates to include new MHHS / Performance Assurance Parties and use MHH terminology to define metering populations

- Section L: housekeeping updates to use MHH terminology to define metering populations

- BCP535: housekeeping updates to include new MHHS / Performance Assurance Parties

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Code Drafting Changes for **Trading Disputes**

We've have made changes to the BSC Sections and BSC Procedures (BSCP) governing the **Trading Dispute** process for MHHS implementation.

These changes including amending:

- BSC Section W: Trading Dispute with house-keeping changes;

- BSC Section U: Provisions Related to Settlement to ensure BSC Central Service will be able to take steps to rectify a Trading Dispute post-MHHS implementation;

- BSCP11: Trading Dispute to include new materiality criteria, the dispute rectification process post-MHHS implementation and enabling digital correspondence of Trading Dispute forms;

- BSCP14: Processing Manifest Error with house-keeping changes; and

- BSCP18: Corrections to Bid-Offer Acceptance Related Data with house-keeping changes.

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Code Drafting Changes for **Performance Assurance Monitoring and Reporting**

New BSCP to replace BSCP533:

Addition of Annual Reporting Requirements:

- The Annual PAM report requirements will be a live document that details a set of reports Elexon's BSC Assurance function will monitor in line with the Risk Operating Plan (ROP). This will be reviewed annually to allow monitoring to concentrate on emerging and high focus Settlement Risks.

Changes to PARMS Serials:

- Removal of Serials SP07 (Supplier Meter Registration Service (SMRS) Meter System Identifier (MSID) counts) and SP09 (Non Half Hourly (NHH) defaults);
- Removal of (NHH) market segment breakdown in all relevant Serials;
- Inclusion of Consumption Component Class Identifier (CCC ID) level Energy aggregation across all relevant Serials to support Supplier Charges;
- Inclusion of Import / Export Group Correction Factor (GCF) breakdown for Serial TA01 (GSP Group Correction Factor).

Changes to Peer Comparison:

- The new BSCP details that Peer Comparison will continue to run with outputs from the Fixed PAM Serials, but with the removal of any reporting relating to Serials SP07 and SP09. Additionally, the BSCP removes the Quarterly Non Public Peer Comparison Report to reduce duplication of reported data from the remaining Serials.
- Additional redlined text wording has been added to capture the DCUSA report specification requirement.

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High Level Principles for **Supplier Charges**

- To be separate from Performance Standards;

- To be a Performance Assurance Technique based on the intent to achieve 100% accurate data by volume;

- No Supplier cap;

- To apply charges per Market Segment (i.e. Advanced, Smart and Unmetered) per GSP per Settlement run (SF and R1);and

- To set a charge based on MWh of estimation below 100% based on the current live Credit Assessment Price when calculations are run, with anyone above a set percentage rewarded via redistribution based on market share and performance.

High Level Principles for **Performance Standards**

- To be separate from Supplier Charges

- Only "hard coded" standard is 100% **accurate** (not actual) data based on CCC allocation

- PAB to set flexible bespoke Supplier targets based on level of estimated data against certain set criteria such as:
  - Percentage of estimation portfolio Settling on non-accurate CCC's
  - Length of estimation

Code Drafting Changes for **Supplier Charges**

Section S

- **Section 3** updated to provide flexibility to derogate the existing charges if required to and apply the MHHS Supplier Charges with a three month notice period.

Section S – 1

- **Section 3.6** added: **" MHHS Supplier Charges Methodology"**

Tables contained in **3.6.6.2** are for illustrative purposes to outline Consumption Component Classes to be considered for Supplier Charges by the Performance Assurance Board.

Table in **3.6.2.3** details the charging structure

Design principle to apply a higher charge compared to existing methodology at an earlier settlement run to encourage the timeliness of accurate data.

- o Current Supplier Charges are £0.28 per MWh at SF and £3.09 at RF
- o Current Live Credit Assessment Price (effective from 2/2/224) - £85MWh

- **Section 4.2** added: **" MHHS Supplier Charges – Collection and Recovery"**

BSCPXXX_MHHS Supplier Charges

- New BSCP

Supplier Charges Code Drafting Approach **Not Endorsed** by Performance Assurance Board (PAB)

Recognition that code drafting approach reflective of the design.

Supportive of:

- The Performance Technique's intent to reach 100% accurate data by volume, per Market Segment, per GSP per SF and RF settlement runs; and

- Redistribution based on Market Share and Performance per Market Segment, per GSP per Settlement Run (SF and RF) .

Not Supportive of:

- PAB's flexibility to determine the Consumption Component Classes liable for Supplier Charges;

- Percentage (1% and 2%) of Credit Assessment Price at SF and R1; and

- Option of providing flexibility for PAB to determine percentage of Credit Assessment Price.

PAB noted that design discussed the principle of applying charges at MSID level based on the age of estimation and that this was not included in the code drafting due to time constraints, however it remains an option develop in the future.

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Code Drafting Changes for **Production, Submission, Audit & Approval of Line Loss Factors**

Changes have been made to the BSC Procedures (BSCP) governing the **Production, Submission, Audit & Approval of Line Loss Factors** process for MHHS implementation.

The changes relate to adding DUoS Tariff ID to the text where appropriate and reflecting that the D0265 submission for LDSOs has altered.

The changes are included in the following;

- BSCP128 Appendix 3;
- BSCP128 Appendix 4; and
- BSCP128 Appendix 9.

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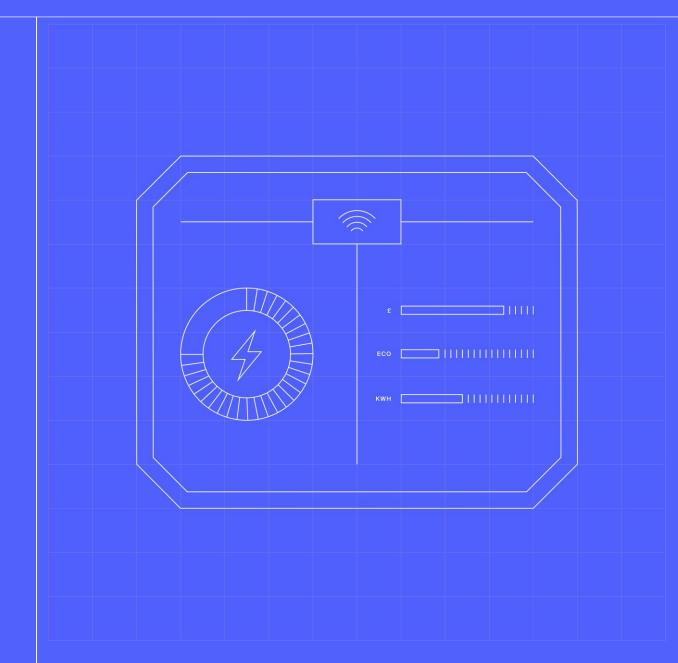# Code Drafting Changes for **Qualification**

Section J

•Changes to Re-Qualification; and

•Creation of Renewal of Qualification.

BSCP537

•Changes to Qualification processes (for new applicants);

•Changes to Re-Qualification process;

•Removal of Annual Statement of Qualified Status;

•Creation of Renewal of Qualification process; and

•Changes to Surrender of Qualification process.

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Distribution Connection and Use of System Agreement (DCUSA) Code Artefacts

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Approach post Transition consultation

- The document has been amended against the latest version of DCUSA (v15.4) issued in November;

- Includes all amendments in strikethrough (including those already benchmarked); and

- Amendments made post the Transition consultation have a comment explaining the change (e.g. the comment I.D. from the consultation comments log)

Changes made

- Minor housekeeping changes suggested in the Transition consultation;

- Some definition titles amended to align with the Mop Up 1 Tranche BSC definitions;

- Amended some clauses to differentiate between the DTN and the DIP post discussions with the Issue 101 Elexon team;

- Inclusion of the implementation date of BSC Modification P432; and

- The DCUSA Legal review.

Still outstanding

- The DCUSA query relating to the new location of the Supplier Metering System Count Report (latest position is that it is expected to be in the new BSCP covering the Performance Assurance reporting (evolution of BSCP533)).

Thank you

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