

Attachment A : Operational Review of BSCP32 'Metering Dispensations' Issues Register V3.0

Proposed changes to BSCP32

Issue Ref.	Issue	Current Provision	Solutions for consideration
1.	<p>Alignment with the BSC Ambiguity in Section L1.1 with regard to Metering Dispensations against Boundary Point or System Connection Point.</p> <p><i>Issue identified by Participant.</i></p>	BSCP32 and precedent have allowed for Metering Dispensations in relation to the Boundary Point or System Connection Point set out in the Code.	<p>ELEXON Legal view is that Section L1.1 is clear and allows for a dispensation against a Defined Metering Point (DMP) by virtue that DMPs are covered under the various Codes of Practice and the DMP relates to Boundary Point or System Connection Point. However, the reason for an application in BSCP32 may benefit from some rewording to ensure clarity.</p> <p>Action: ELEXON to raise a CP against BSCP32 to provide clarity with regard to the reasons for application.</p>
2.	<p>Alignment with the BSC BSCP32 allows for dispensations with regard to non-standard BM Unit configurations. This is not in alignment with processes defined in Section K.3.</p> <p><i>Issue identified by Review Group.</i></p>	Section K.3 deals with process for applying for a non-standard BM Unit configuration.	<p>Remove all references to non-standard BM Units from BSCP32. However, inclusion of a process for the application for non-standard BM Unit configuration in BSCP15 'BM Unit Registration' may be beneficial.</p> <p>Action: ELEXON to raise a CP, removing from BSCP32 the option for applicants to seek a dispensation for a non-standard BM Unit.</p> <p>ELEXON to investigate whether BSCP15 needs clarity with regard to registrants seeking approval for non-standard BM Units.</p>

Attachment A : Operational Review of BSCP32 'Metering Dispensations' Issues Register V3.0

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3.	<p>Confidential Site Specific Dispensations The Code does not specify that applicants can apply for Site Specific Metering Dispensations on a confidential basis.</p> <p><i>Issue identified by Review Group.</i></p>	BSCP32 allows for Metering Dispensations on a confidential basis.	<p>As there is no specific provision within the Code, the review believes that provision in BSCP32 should be removed. However, ELEXON should consider any request for confidentiality on a case-by-case basis and use committee confidentiality processes as appropriate.</p> <p>Action: ELEXON to raise a CP to remove the confidential Metering Dispensation application process from BSCP32.</p>
4.	<p>Timescales There are some inconsistencies in BSCP32.</p> <p>The timescales may not be realistic, especially if the applicant has not thought through the application or provided all the information required. The timescales can be particularly problematic with regard to internal paper days for the Panel Sub-committees.</p> <p><i>Issue identified by both Participants and Review Group.</i></p>	The timescales for Metering Dispensations are defined in BSCP32.	<p>The review carried out a walkthrough of BSCP32 and has identified areas for change to remove the inconsistencies. This will be reflected in a TAI to be raised against BSCP32.</p> <p>Action: ELEXON to raise a CP against the Interface and Timescales section of BSCP32.</p>
5.	<p>Formatting and structure of BSCP32 Formatting and structure is out of date and would benefit from some redrafting.</p> <p><i>Issue identified by both Participants and Review</i></p>	BSCP32 is in the format of AP32.	Bring in line with current BSCP drafting formatting and structures, including the provision of workflow diagrams and improved form design.

Attachment A : Operational Review of BSCP32 'Metering Dispensations' Issues Register V3.0

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	<i>Group.</i>		Action: ELEXON to raise a CP against BSCP32 to provide a more user friendly procedure and form design.
6.	<p>Metering Dispensations Guidelines Lack of guidance and information available to applicants. This results in inadequate applications, which in turn may delay the application (if the applicant agrees) or result in ELEXON recommending that the application is rejected.</p> <p><i>Issue identified by both Participants and Review Group.</i></p>	Section L3.4 and BSCP32.	<p>The review did not see the need for separate guidelines, as BSCP32 itself constitutes the guidelines. However, it was recognised that BSCP32 could be more user-friendly.</p> <p>Action: ELEXON to raise a CP against BSCP32 to provide a more user friendly procedure.</p>
7.	<p>Transfer of Site Specific Metering Dispensations Two processes for identifying a dispensation exist for a new Registrant of a Metering System: Metering Technical Details (MTDs) and BSCP32 process for the transfer of a Metering Dispensation. The later may be redundant.</p> <p><i>Issue identified by Review Group.</i></p>	BSCP32 has processes for the transfer of Site Specific Metering Dispensations. Metering Dispensation information forms part of the MTD.	<p>A dispensation relates to Metering Equipment rather than its Registrant. The review believes that as relevant information exists in the MTDs, there is no requirement for a transfer of the dispensation to a new Registrant. Furthermore, publication of all live dispensations on the BSC Website would provide visibility on whether a dispensation exists for a Site.</p> <p>ELEXON will ensure that as part of the Change of BM Unit Ownership (CoBO) processes, the new Registrant is made aware of any outstanding conditions attached to the dispensations, and therefore Metering System. This may require a change to BSCP15.</p>

Attachment A : Operational Review of BSCP32 'Metering Dispensations' Issues Register V3.0

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			<p>Action: ELEXON to raise a CP against BSCP32, removing the need to formally request the transfer of a Metering Dispensation from existing Registrant to new Registrant.</p> <p>ELEXON to investigate if a change to BSCP15 will be required.</p>
8.	<p>Objections Process A recent incident highlighted the issue for consideration.</p> <p><i>Issue identified by Participants</i></p>	There is no objection process.	<p>Section L3.4.3 and L3.4.5 defines a consultation process for dispensation applications.</p> <p>Action: ELEXON to raise a CP to ensure that the process is clear in BSCP32 for the consultation with affected parties prior to application and by ELEXON on behalf of the Panel during the application process. This would enable affected parties and applicants can resolve issues prior to application and/or the views of any affected parties are presented to the appropriate Panel sub-committee.</p>
9.	<p>Consultation Process Need to ensure that the consultation process is followed.</p> <p><i>Issue identified by both Participants and Review Group.</i></p>	<p>Panel must consult with all Parties for applications for dispensations under Section L3.4.4.</p> <p>The Registrant must consult with affected parties for dispensation sort under Section</p>	<p>There is a need to ensure that all affected parties are consulted in accordance with Section L3.4.3 and L3.4.5.</p> <p>The review proposes that the process is clearly defined within BSCP32, with a pre-application</p>

Attachment A : Operational Review of BSCP32 'Metering Dispensations' Issues Register V3.0

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		L3.4.1.	<p>consultation between the applicant and affected parties taking place prior to submission. This would ensure that any issues between the applicant and affected parties are sorted prior to the application. A consultation will also be carried out by ELEXON with affected parties.</p> <p>Action: ELEXON to raise a CP to ensure that the process is clear in BSCP32 for the consultation with affected parties prior to application and by ELEXON on behalf of the Panel during the application process. This would enable affected parties and applicants can resolve issues prior to application and/or the views of any affected parties are presented to the appropriate Panel sub-committee.</p>

Attachment A : Operational Review of BSCP32 'Metering Dispensations' Issues Register V3.0

Proposed changes to Code of Practice

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10.	<p>Publication of Generic Metering Dispensations By publishing generic Metering Dispensations as appendices in the CoPs, whenever a new generic dispensation is granted, ELEXON is required to raise a CP to amend the CoP. There are currently a number of generic dispensations that have been granted that have not resulted in an amendment to the CoPs (CoPs 3 and 5).</p> <p><i>Issue identified by Review Group.</i></p>	<p>Generic Metering Dispensations are published as appendices in the applicable CoPs.</p>	<p>Remove Generic Metering Dispensations from CoPs and publish these on the BSC Website.</p> <p>Have generic statement regarding Generic Metering Dispensations and where more information can be found (on the BSC Website) in CoPs.</p>

Attachment A : Operational Review of BSCP32 'Metering Dispensations' Issues Register V3.0

Proposed process improvements, no CP required

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11.	<p>'Metering System Identifier' (MSID) instead of 'Site'</p> <p>Metering Systems registrations are mainly concerned with the MSID when a Site is registered. The Site name and address is secondary once a Metering System is registered.</p> <p><i>Issue identified by Review Group.</i></p>	<p>MSID is not, currently, compulsory, in applications for Metering Dispensations.</p>	<p>The review considered whether to change Site Specific Metering Dispensations to MSID Specific. However, the review supported the view that both MSID and Site Address should be included in any application for a Metering Dispensation.</p> <p>With respect to Metering Systems that are not yet registered, ELEXON should request the Registrant to provide the MSID on completion of registration.</p> <p>Action: ELEXON to ensure that MSID information is obtained as part of the application process.</p>
12.	<p>Metering Dispensation Expert Consultation process.</p> <p>A number of problems have been identified with the current process:</p> <ul style="list-style-type: none"> • The number of experts that respond has dwindled. • There are no terms of reference to provide guidance to the industry experts, which has resulted in confusion. <p><i>Issue identified by both Participants and Review Group.</i></p>	<p>Section L3.4.3 (d) allows for the Panel to consult with any such persons that it shall consider appropriate. In practice, this has been carried out by using a number of industry experts as a review group.</p>	<p>Several options were considered with regard to the expert group, as follows:</p> <ul style="list-style-type: none"> • Continue with the same process, but seek additional experts from the industry; • Use only ELEXON expertise; • A review group meeting made up of external and ELEXON experts (similar to HHTAG).

Attachment A : Operational Review of BSCP32 'Metering Dispensations' Issues Register V3.0

			<p>ToR are required to provide clear guidelines to the group and the options for which comments may be provided.</p> <p>The review supported the view that external expertise was still required. However, the review recognised that there may be cases where the Panel sub-committee wished for further discussion to take place and therefore defer a decision following further investigation and/or consultation. In such circumstances, the review group recommend that it may be necessary for the expert group to sit, potentially with the applicant and any affected parties in attendance.</p> <p>Action: ELEXON to seek endorsement from ISG and SVG on setting up a new Metering Dispensations Expert Group with Terms of Reference.</p>
<p>13.</p>	<p>Metering Dispensations webpage Lack of information for applicants etc.</p> <p><i>Issue identified by Review Group.</i></p>	<p>A Metering Dispensations page was launched as part of the BSC Website re-launch. This includes:</p> <ul style="list-style-type: none"> • Links to BSCP32; • Contact details; <p>Brief explanation of what is a Metering Dispensation.</p>	<p>The Metering Dispensations web page will be expanded to include all live Metering Dispensation, both Generic and Site Specific.</p> <p>Action: ELEXON to look at providing list of all dispensations.</p>

Attachment A : Operational Review of BSCP32 'Metering Dispensations' Issues Register V3.0

Proposed no change required

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14.	<p>Appeals Process Lack of appeals process.</p> <p><i>Issue identified by both Participants and Review Group.</i></p>	There is no appeals process.	<p>There is no sanction against an unsuccessful applicant re-applying. Therefore, no appeals process is required, nor is there a need for change to existing processes as a result.</p> <p>Action: no change required.</p>
15.	<p>The Applicant LDSOs and MOAs are not able to apply for a Metering Dispensation. For Sites where Metering Systems have yet to be installed, the LDSO may want to have a dispensation in place prior to registration.</p> <p>For MOAs, they may identify requirements for a dispensation; and understand the Metering Systems better than the Registrant.</p> <p><i>Issue identified by both Participants and Review Group.</i></p>	Previous interpretation of BSC Section L3.4 was that only the Registrant of a Metering System can apply for a Metering Dispensation.	<p>ELEXON Legal view is that an intended Registrant, as a BSC Party, may seek a dispensation under Section L3.4.4. In such cases, the Panel would be required to consult with all Parties, in accordance with L3.4.5. There is, therefore, no requirement for a Modification to the Code in this respect.</p> <p>If an MOA identifies a need for a dispensation, they may complete an application, but this must be endorsed by the Registrant.</p> <p>Action: no change required.</p>