Title *(mandatory by originator)*

ECVNA Authorisation Terminations Effective on Receipt

Description of Change

The Code, Section P 2.2.2 and P 3.2.2 requires that any Authorisation Termination Request submitted to the Energy Contract Volume Aggregation Agent (ECVAA) be effective on receipt by the ECVAA.

However, BSCP 71 'ECVNA and MVRNA Registration, Authorisation and Termination', supported by the ECVAA System documentation (including the User Requirements Specification (URS)) require 1 calendar days notice of the Authorisation Termination.

Therefore the ECVAA System requires amendment to accord with the Code obligation that Authorisation Termination Requests become effective on receipt by the ECVAA.

It should be noted that there are two solutions proposed – a manual solution and an automated solution.

It should also be noted that the NETA Data File Catalogue, ECVAA Service Description and the associated ECVAA system documentation (including the ECVAA URS) currently refer to the Authorisation Termination Request being submitted only by either of the two counterparties to the Authorisation. The Code (Section P 2.2.2 and 3.2.2) also allows a notification agent (ECVNA and / or MVRNA respectively) to submit such an Authorisation Termination Request, and therefore this obligation should be reflected in the documentation.

Proposed Solutions

Currently the ECVAA receives a manual request for a notification agent Authorisation Termination, via a form from BSCP 71:

−   ECVNAs – Form BSCP71/03, equivalent to the ECVAA-I002 (E0021); and

−   MVRNAs – Form BSCP71/05, equivalent to the ECVAA-I003 (E0031).

Two solutions have been proposed to allow these termination requests to become effective on receipt.

Solution 1 – Manual Process

The first solution proposes a new manual process, which represents the minimum change required to the ECVAA systems to allow it to fulfil its obligations as set down in the Code.

On receipt and processing of a valid Authorisation Termination Request, the ECVAA will terminate the relevant notification agent Authorisation (taking into consideration the Service Level requirement that such requests be processed by the ECVAA within 1 hour of receipt) immediately, regardless of the Effective To Date specified in the Authorisation Termination request.

As this is a manual procedure, for the avoidance of doubt Authorisation Termination Requests received outside of Business hours will be processed by ECVAA, according to the ECVAA Service Levels, at the beginning of the next Business Day.

The ECVAA system requires amendment to enable within day terminations of Authorisations.

The NETA Data File Catalogue, ECVAA Service Description and associated ECVAA system documentation should be amended to include reference to the ability for the notification agent to submit Authorisation Termination Requests.

Solution 2 – Electronic Process

The intent of this solution is to replace the manual interface with an automated electronic version, according with the format outlined in the ECVAA URS and IDD Part 1 for the ECVAA-I002 (ECVNA Authorisation Termination) and ECVAA-I003 (MVRNA Authorisation Termination).

Receipt, validation and processing of an electronic Authorisation Termination Request can be undertaken outside of operational hours, as it will be automated in entirety by the ECVAA.

Therefore on receipt of a valid Authorisation Termination Request, the ECVAA will terminate the relevant notification agent Authorisation (taking into consideration the Service Level requirement that such requests be processed by the ECVAA within 1 hour of receipt) immediately, regardless of the Effective To Date specified in the Authorisation Termination request.

Currently whether the Authorisation Termination Request is rejected or accepted, the ECVAA returns the BSCP71/03 and BSCP71/05 forms (depending on which notification agent the request pertains to) detailing either the acceptance or rejection of the request, as appropriate. The forms equate to the following ECVAA interfaces:

ECVNAs - BSCP71/03 (feedback) is equivalent to the ECVAA-I007 (E0071); and

MVRNAs – BSCP71/05 (feedback) is equivalent to the ECVAA-I008 (E0081).

Therefore, the manual feedback interface can be replaced with an automated electronic version, according with the format outlined in the ECVAA URS and IDD Part 1 for the ECVAA-I007 (ECVNA Authorisation Termination Feedback) and ECVAA-I008 (MVRNA Authorisation Termination Feedback). The automated feedback will be produced by the ECVAA following receipt, processing and validation of the automated Authorisation Termination Request.

The automation of the Authorisation Termination requests means that issues may arise regarding timings of Authorisation Terminations and notification rejections, for example, a notification may be submitted before the Authorisation Termination request, but processed after, and will therefore be rejected by the ECVAA. Therefore it is proposed that the automated feedback interface ECVAA – I007 has an additional data item added into the 'ER2 'ECVNAA Request' Group, detailing the 'Authorisation Date and Time' and the ECVAA – I008 has an additional data item added into the 'MA9 'MVRNAA Request' Group, detailing the 'Authorisation Date and Time'.

The automation of these interfaces allows notification agent Authorisation Termination Requests to be processed, and responded to, outside of operational hours, on a real time basis.

Associated Change Proposal

The ECVAA-I002 and ECVAA-I003 format also include the relevant data items / structure for requesting the Authorisation of a notification agent and for requesting a Key Change and the ECVAA-I007 and ECVAA-I008 format also include the relevant data items / structure for feedback regarding the request for the Authorisation of a notification agent and for a request for a Key Change. Therefore if the notification agent Authorisation Termination Request and the associated feedback is to be automated, utilising the existing format for the relevant interfaces, then it seems appropriate to automate all of the other functions covered by the interfaces. Therefore an associated Change Proposal (CP886) has been raised in order to effect this amendment.

It should be noted that, if it is determined that there is no requirement to automate the Authorisation Request / Key Change Request functionality, and the amendment to automate the Authorisation Termination Request process is progressed, then either:

– The existing interface definition for the ECVAA-I002, ECVAA-I003, ECVAA-I007 and ECVAA-I008 will require amendment to reflect the differing manual versus automated usage; or

New interface definitions will need to be created for the automated interfaces, and the existing definitions retained, with the requisite amendments (to remove the automated functionality), for the manual interfaces.

Justification for Change

Modification Proposal P47 'Termination Process for ECVNA and MVRNA Authorisations' was raised in order to address an inconsistency between the Code and the operational practice of the ECVAA system (which is supported by the Code Subsidiary Documentation). An interpretation of the relevant sections (Section P 2.2.2 and 3.2.2) of the Code requires that ECVNA and MVRNA Authorisation Termination Requests become effective on their receipt by the ECVAA. However, operationally the ECVAA requires 1 calendar day notice to ensure that the Notification Agents (ECVNAs and MVRNAs) Authorisations are terminated for complete Settlement Days. The one calendar day requirement of ECVAA is supported by the associated BSC Procedure (BSCP 71 'ECVNA and MVRNA Registration, Authorisation and Termination') and the ECVAA system documentation.

However, Modification Proposal P47 was rejected by the Authority, on the recommendation of the Panel, on the basis that the majority of BSC Parties indicated, in response to the consultation on the draft Modification Report for P47, that they would prefer to be able to terminate notification agent Authorisations immediately, rather than incur a 1 calendar day wait. Therefore the ECVAA system functionality, and the associated documentation requires amendment to accord with the relevant provisions of the Code.

The obligations of the Code, with regards to the ability of the notification agent to submit an Authorisation Termination Request (under Section P 2.2.2 and 3.2.2) should be reflected in all of the relevant documentation, namely the NETA Data File Catalogue, the ECVAA Service Description and the ECVAA system documentation (including the ECVAA URS).

Other Configurable Items Potentially Affected by Proposed Solution(s)

The amendment to the notification agent Authorisation Termination Request processing timetable will require an associated amendment to:

– BSCP 71 'ECVNA and MVRNA Registration, Authorisation and Termination';

– The ECVAA Service Description;

– The NETA Data File Catalogue;

– The ECVAA system and software; and

– The ECVAA User Requirements Specification (and associated system documentation).

The amendment to the documentation to reflect the notification agent submission of an Authorisation Termination Request requires amendment to:

– The ECVAA Service Description;

– The NETA Data File Catalogue; and

– The ECVAA User Requirements Specification (and associated system documentation).

Impact on Core Industry Documents

None

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Related Changes and/or Projects

Modification Proposal P47 'Termination Process for ECVNA and MVRNA Authorisations' (provides history and context);

CP571 'Amendments to the ECVAA URS'

CP878 'Removal of Requirement in BSCP71 to give notification of superseded ECVNA/MVRNA Authorisations'

CP886 'ECVNA and MVRNA Authorisation Request and Key Change Request Automation'

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Date: 15 November 2002

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