

ATTACHMENT 1: NON-CONFIDENTIAL RESPONSES TO EMR CIRCULAR 2

Respondent: Kristian Pilling

Company: SSE

Comment	Response
<p><u>BMU ID Format</u></p> <p>"C_" is unlikely to be discerning enough to enable a Supplier to know if the Additional BMU relates to a mandatory CfD Unit or a voluntary Capacity Mechanism Unit. As a result this may lead to confusion, as well providing a limitation of 999 CfD or Capacity installations within a GSP Group. GB-wide this will mean no more than 14,000 CfD or CM participating units with capacities <100MW for the longevity of the EMR scheme. We therefore question whether this is sufficient/scalable.</p>	<p>The two main reasons for the naming convention are:</p> <ol style="list-style-type: none"> 1. Help keep an association between a set of A.BMUs and a CfD, for the lifetime of the CfD (it's unlikely this will be used for CM). 2. Facilitate the exclusion of the £100 monthly BSC charge for A.BMUs. <p>It's assumed that using the BMU Id filed would allow participants to more easily identify A.BMUs being used for EMR as it appears in Settlement data flows, and not just registration data flows (i.e. it appears in the SAA-I014). Is that the case for you?</p> <p>- We would be keen to understand your need to identify A.BMUs as being used for CM or CfD more. As a Party you should know which of your A.BMUs have a CfD or are in the CM. SSE: This may be the case for CfD providers or Capacity Providers, however as a Supplier it is not immediately obvious which CfD Provider or Capacity Provider belongs to which A.BMU – does it matter if MPANs get mis-assigned between schemes?</p> <p>- Would you propose that we create further identifiers e.g. 'C_' for CfD and 'F_' for CfD? SSE: This sounds like a sensible suggestion, and helps to denote the scheme that is to be used.</p> <p>- How will/do you use the BMU Id field to report on different types of BMUs? SSE: Within SVA most settlement occurs under the Default Base BMU</p> <p>- The naming convention proposal only applies to A.BMUs. Would you like to see it extended to CVA BMUs and why? Please note this may be something we cannot deliver as it is not strictly necessary for EMR.</p>

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	<p>SSE: Not necessary for CVA BMUs given that the CfD Provider or Capacity Provider is likely to be the registrant. The A.BMU process is not similar because a Supplier is acting as an intermediary in the registration process – it is this role that becomes convoluted under the A.BMU process</p> <p>- The limitation on the number of A.BMUs under the new naming convention is limited to 999 A.BMUs per GSP Group. It is impossible to know how many will be needed, but this we assume this will be enough. Would you consider it better to have a identifier for CfD, CM and EII, rather than just EMR – and would you prefer these identifiers to appear in the BMU Id field or the BMU Name filed or both? What implications could this have on your systems? SSE: An additional 'C' or 'F' identifier immediately allows double the number of systems. Can DECC provide an indication of the scalability of the current solution? Also, how is EII relevant here?</p>
<p><u>BMU Name</u></p> <p>We note the BMU Name is not technically a data item, only the BMU Id features in the flows suggested within the Impact Assessment. This means that the BMU Name itself is not passed effectively throughout industry flows therefore is unlikely to make a suitable CfD reference for any Supplier/Generator party beyond the initial registration paperwork. We are not of the view the current proposal allows the sharing of registration information beyond the initial registration conducted by the BSCCo on behalf of all exporting Suppliers in the GSP Group. If the BMU Name is to assist the industry, then it is necessary to establish a robust process for the BSCCo to share full Additional BMU registration information.</p>	<p>A summary of some key BMU data flows – are there any others?</p> <p>- The CRA-I014 flow sent by the CRA upon registration of BM Units contains the BM Unit Name field (text 30) and BMU Id field (text 11). SSE: Is this flow available to Registration Parties? I must admit I haven't come across this data flow in normal Settlement processes.</p> <p>- The SAA-I014 flow does not contain the BM Unit Name field, but does contain the BMU Id.</p> <p>- All BMU registration information is available on the ELEXON Portal. SSE: At what interval can we expect the portal registration information to be available/updated</p> <p>Will all Exporting Suppliers be listed under the new A.BMU for each CfD? I'm not immediately sure this will help to clarify the registration process.</p>
<p><u>Additional BMU Assignment</u></p> <p>Once an Additional BMU has been created by the BSCCo, it is not immediately obvious to a Supplier that a BMU has been registered, or</p>	<p>- The D0270 (Market Domain Data Incremental Set) and D0269 (Market Domain Data Complete Set) do not contain BM Unit data.</p> <p>- The D0299 (Stage 2 BM Unit Registration Data File) is used to update MDD with BM Units and</p>

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<p>what identifier has been used. Although the BMU is a requirement of MDD, it does not appear to feature as an item within the MDD Data Sets (D0269 or D0270). A Supplier will need to assign the CfD MPAN to the Additional BMU yet will have no record of either the appropriate BMU ID or the effective dates to use for the CfD installation. It is not clear that there is a robust industry process defined for this notification.</p>	<p>their associations to Suppliers and GSP Groups. Supplier and HHDA's receive this flow.</p> <p>If and when a Supplier takes on a CfD (or CM) generator the relevant MPANs would need to be assigned to the relevant A.BMU. The relevant A.BMU should be the one registered to that Supplier as part of a set of A.BMUs registered for that CfD generator i.e. the CfD generator should be able to tell the Supplier what the relevant CfD Id is (which will be stored in the BMU Name field), so the Supplier knows which A.BMU to use. The CfD generator will need to ensure that it tells the CfD Settlement Agent which A.BMU to use for CfD Settlement. SSE: We agree with this comment and would like the following sentence removed from our consultation response please, "Although the BMU is a requirement of MDD, it does not appear to feature as an item within the MDD Data Sets (D0269 or D0270).</p>																
<p><u>Additional BMU Assignment</u></p> <p>We seek some clarification on what action should be taken in an instance of the HHDA rejecting the assignment of the MPANs to the Additional BMU.</p>	<p>- The D0295 (Rejection of BM Unit Allocation) contains the J1646 data item (BM Unit Allocation Rejection Reason Code):</p> <table border="1" data-bbox="965 802 1559 1313"> <tr> <td>01</td> <td>Missing/Invalid File Sequence Number</td> </tr> <tr> <td>02</td> <td>Missing/Invalid Instruction Number - not in sequence</td> </tr> <tr> <td>03</td> <td>Supplier not registered to the metering point as at EFSD {MSBMU}</td> </tr> <tr> <td>04</td> <td>Missing/Invalid MPAN core</td> </tr> <tr> <td>05</td> <td>HHDA not registered to the metering point as at EFSD {MSBMU}</td> </tr> <tr> <td>06</td> <td>Invalid EFD - allocation received after Gate Closure for the first Settlement Period of EFSD {MSBMU}</td> </tr> <tr> <td>07</td> <td>Missing/Invalid Supplier/BM Unit combination for this GSP Group</td> </tr> <tr> <td>08</td> <td>Invalid BM Unit/Metering Point allocation - allocation is already effective for this metering point</td> </tr> </table>	01	Missing/Invalid File Sequence Number	02	Missing/Invalid Instruction Number - not in sequence	03	Supplier not registered to the metering point as at EFSD {MSBMU}	04	Missing/Invalid MPAN core	05	HHDA not registered to the metering point as at EFSD {MSBMU}	06	Invalid EFD - allocation received after Gate Closure for the first Settlement Period of EFSD {MSBMU}	07	Missing/Invalid Supplier/BM Unit combination for this GSP Group	08	Invalid BM Unit/Metering Point allocation - allocation is already effective for this metering point
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	<p>We appreciate that this may not be a commonly used process, but it is an existing one that relevant Suppliers will need to use for the EMR. It can be thought of as an extension to the change of Supplier processes.</p>
<p><u>Additional BMU Process</u></p> <p>This process does not appear to be greatly visible and could benefit from being streamlined.</p>	<p>- Happy to discuss. What specifically are you looking for / do you think needs streamlining?</p>
<p><u>Additional BMU De-registration</u></p> <p>If the BSCCo choose to de-register a BMU, we must understand what validation will be undertaken by BSCCo to ensure the BMU has no MPANs attached. For example, if the BMU is ended before the actual supplier transfer date it is conceivable that a CfD unit could be left with no means of receiving income for the period of the gap. Given the complexities of the process, it will be difficult to adjust retrospectively.</p>	<p>- BSCCo will de-register under instruction from the Settlement Agent. This will occur if the CfD/Capacity Agreement comes to an end. Suppliers will have to register a new A.BMU if they wish to keep the MPAN(s) in an A.BMU, otherwise it will be assigned to the Base BM Unit by SVAA. The Supplier should re-allocate the MPAN(s) to its Base BM Unit rather than relying on SVAA validation processes.</p>

Respondent: Martin Mate

Company: EDF

Comments

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Page 1/2, General description of proposed BM Unit and meter data arrangements

"...all metered data for Licensed Suppliers will be provided by BSCCo."

Is this necessarily true for complex sites, for example private wire sites which may have net demand associated with a supplier and licence exempt on-site generation participating in a CfD or Capacity arrangement? Will the supplier obligation associated with such sites be based on net boundary volumes? Or will there be some kind of difference arrangement between EMR contract volumes and boundary meter volumes measured under the BSC?

The registration and data-handling for CfD generators would be much simpler if they were required, like licensed generators, to register in CVA (CMRS/CDCA). Each scheme would then have a single easily transferable BM Unit whose meter data could be collected and processed centrally. There would not need to be large numbers of "dummy" unused BM Units. Contract-holder involvement in the complex SVA/MRA/DTN arrangements could be avoided altogether. Concessions on central costs could be provided, in the same way as being considered for SVA BM Units.

Page 2, Identification of EMR-Contracted BM Units

A new BM Unit parameter or parameters, being the unique CFD or CM contract ID, or simply whether a CFD or CM contract applies, with its unique ID being managed separately, could be defined. This would allow CVA BM Units that have a CfD or CM contract to be easily identified (while still adhering to the existing convention of T for a directly connected generator or demand, E for an embedded generator/demand, and M for special cases). Presumably this would be a more expensive development than simply using the name to code this information and maintain a separate mapping of codes to contracts.

Without something like this, it will not be easy to identify CVA BM Units participating in the CfD or CM schemes, and the BSC registration system will need to be partially duplicated for EMR.

Page 2, Comments on the proposed naming scheme for SVA registered Additional BM Units associated with CfD or CM contracts

As above, my understanding is that CFD and CM contracts will be mutually exclusive. It might be convenient if the name contained sufficient information to identify which applied to a particular BM Unit. For example, initial letter F for a FITS-CFD contract, and C for a unit associated with a Capacity Provider (though there may be no such information for CVA registered BM Units).

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To allow more space for unique identifiers within the existing 11 character interface format for BM Unit ID, it might be sensible to remove at least one of the non-informational underscore characters at the beginning of the SVA BM Unit name. This would leave 4 characters for the identifier instead of 3. 999 x minimum 5 MW CfD schemes ~ 5000 MW.

Alternatively, non-numeric characters might eventually be required to uniquely identify schemes. This would greatly increase the number of unique identifiers that could be used within 3 characters. The identification scheme appears to assume sequential numbering of successive schemes. Non-numeric identifiers could be added later if necessary eg. 000-999, A00-A99, B00-B99 etc.

In the timeline example on page 3

The row starting 14 May 2015 refers to BMUs with go-live in MDD with effective-from dates of 1 June 2015. The following row starting 15 June 2015 refers to these BMUs becoming effective in MDD and CRS, yet also says the effective date would be 1 June. Is there a typo in the example, or is this referring to some kind of retrospective registration?

Table on page 4

How much easier it would be if there were a single BMU associated with the scheme, registered to a supplier (or any other BSC party) and transferable between parties!

Page 4, on "Who will the naming convention impact?"

Some indication of the number of additional BM Units likely to be reported in SAA-I014 data would be useful. This may impact participants internal data processing and storage system capacity, performance and cost.

Would parties be made aware in advance of the EMR Additional BM Units that may be registered to them by BSCCo/EMRCo, through any other means than MDD data?

Would "BSCCo" register the necessary BM Units, or would "EMRCo" be a BSC Party who would register the BMUs?

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Respondent: Paul Jones

Company: E.ON

Comment

Thanks for the opportunity to comment on the above circular. We have not been able to carry out a thorough assessment of what the potential new format would mean for us at this point, but our high level views are as follows:

The proposal to have a number of "dummy" A.BMUs to cover all possible combinations of CFD/Capacity Contract and supplier means that there is a potential for data files to become very big if these redundant A.BMUs are included. The I014 flow in particular is very large already. This will have an implication on data storage costs, unless the flows only contain details of the active A.BMU for a particular EMR contract.

A new BMU format is likely to have implications for systems and processes (covering settlements, forecasting etc) which use BMU data. If such a change is going to be made we would need sufficient time to assess these impacts and make any associated changes. As most companies' IT budgets and change programmes are likely to be very stretched, lead times are likely to be relatively long. Therefore, sooner the new format is decided upon and communicated the better.

Respondent: Kirandeep Samra

Company: npower

Comment

Hi,

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Thank you for the opportunity in allowing Npower to respond to EMR Circular 2 EMRC2 - Proposed Naming Convention for Additional BM Units Registered for EMR, from an Npower perspective the conventions would allow us to easily distinguish between the EMR BMUs and other BMUs.

Apart from this comment we have no comments to make but please do keep us updated on any updates or consultations.

Any questions please ask

Respondent: Phil Hewitt

Company: EnAppSys Ltd

Comment

Dear Sir/Madam,

Thank you for giving EnAppSys Ltd the opportunity to comment on the proposed naming convention for BM Units. You may treat our response as non-confidential.

We understand from the document that there are two fields in the CRA BM Unit records to be used to indicate a CfD or CM BM Unit in SMRS. A CfD or CM BM Unit in SMRS will have a BM Unit ID commencing with a C_ instead of the usual 2_ and the CRA name record which will be used to identify the CfD or CM round that the BM Unit is associated with.

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We believe that the proposal to create a new class of BM Unit ID commencing with C_ will be problematic for participants. Many participants will group BM units together in analysis by using the first characters of the BM Unit ID to identify SMRS BM Units, transmission connected, interconnectors and CVA embedded BM Units. There will many software systems and models throughout the industry that will be impacted by the creation of a new class of BM Unit ID. From our experience we know it will require code changes in our own code base and in dependent EnAppSys customer database systems. We would like CfD and CM BM Units in SMRS to retain their 2_ BM Unit IDs.

We believe that the proposed convention for tagging BM Units to CfD and CM rounds by hard-coding the CRA BM Unit name field with a naming convention is a useful proposal. This would help in that it would allow CfD or CM stations in SMRS which change supplier to be tagged through the life of the asset. At EnAppSys we would use this data to identify stations with different running regimes because of their status in CfD and CM.

We do not understand the need to change two fields to indicate SMRS BM Units that are operating under the CfD or CM. There will be duplication of data. We would propose that the CRA BM Unit name convention only is used to identify the units participating in CfD or CM and the CRA BM Unit ID field remains the same for a SMRS BM Unit, i.e. starting with 2_.

If you have any questions or queries please do not hesitate to call.