
















BSC Modification Proposal Form		At what stage is this document in the process?
<p>PXXX</p> <p><i>(Mandatory for BSC Change Analyst to complete.)</i></p> <p>CVA Registrants connecting to Distribution Systems to accede to the DCUSA</p>		<div>01 Modification</div> <div>02 Workgroup Report</div> <div>03 Draft Modification Report</div> <div>04 Final Modification Report</div>
<p>Purpose of Modification:</p> <p>This modification is to oblige CVA Registrants connecting to a Distribution System to accede to the DCUSA which will negate the need for a bilateral Use of System Agreements between the LDSO and the CVA Registrants saving administrative cost and effort and promoting efficiency and consistency.</p>		
	<p>The Proposer recommends that this Modification should:</p> <ul style="list-style-type: none"> be assessed by a Workgroup and submitted into the Assessment Procedure 	
	<p>High Impact:</p> <p>None</p>	
	<p>Medium Impact:</p> <p>Trading Party – Generators, LDNOs, IDNOs</p>	
	<p>Low Impact:</p> <p>None</p>	

Contents		 Any questions?
1 Summary	3	Contact: [BSC Change Analyst's name]
2 Governance	3	
3 Why Change?	3	 [Insert email]
4 Code Specific Matters	4	 [Insert number]
5 Solution	4	
6 Impacts & Other Considerations	4	Proposer: Richard Ellis
7 Relevant Objectives	5	 rellis@westernpower.co.uk
8 Implementation Approach	6	
9 Legal Text	6	 01332 827 508
10 Recommendations	6	Proposer's representative:
		
		
		Other: Dave Wornell
		 dwornell@westernpower.co.uk
		 0117 933 2032
		Other:
		
		

Timetable	
Please provide Proposer and Proposer Representative contacts and an indicative timetable. The BSC Change Analyst will update the contents and provide any additional Specific Code Contacts. The BSC Change Analyst can provide specific dates based on your Implementation Approach in Section 8.	
The Proposer recommends the following timetable: <i>(amend as appropriate)</i>	
Initial consideration by Workgroup	Week Commencing 17 APR 2017
Assessment Procedure Consultation	03 JUL 2017 – 21 JUL 2017
Workgroup Report presented to Panel	10 AUG 2017
Report Phase Consultation	14 AUG 2017 – 01 SEP 2017
Draft Modification Report presented to Panel	14 SEP 2017
Final Modification Report submitted to Authority <i>[not Self-Governance]</i>	18 SEP 2017

1 Summary

What is the issue?

DNOs currently have to prepare and maintain bilateral Use of System Agreements between themselves and CVA Registrants connecting directly to their Distribution System. These documents would normally be prepared by legal advisers so would have time and cost implications. Moreover, a site can commence importing or exporting electricity under the BSC without a UoSA actually being in place.

This could be avoided if there were an obligation on CVA registrants to accede to the DCUSA so having a completely consistent approach to Use of System and saving the time and resource in preparing and maintaining individual agreements.

What is the proposed solution?

Amend the Code and appropriate procedures to oblige CVA registrants of connections to Distribution Systems to accede to the DCUSA and check/enforce this in any relevant BSC Procedures.

An additional step could be included in BSCP20, Section 3.1 between Refs 3.1.4 and 3.1.5 to check that the Registrant has acceded to the DCUSA.

2 Governance

Justification for proposed progression [not Self-Governance, Fast Track Self-Governance or Urgent]

As the related DCUSA Change is a Part 1 Matter and as such will be submitted to the Authority it is appropriate that this modification be submitted to the Authority at the same time.

Requested Next Steps

This Modification should: assessed by a Workgroup and submitted into the Assessment Procedure.

3 Why Change?

What is the issue?

The BSC requires Suppliers connecting to a Distribution System to accede to the Distribution Connection and Use of System Agreement (DCUSA). However there is no equivalent obligation on all CVA Registrants in particular non-Suppliers to sign up to the DCUSA.

Consequently, for a CVA connection to a Distribution System a CVA Registrant has to enter into a Use of System Agreement with a LDSO in addition to there being a normal connection agreement under the National Terms of Connection (NTC).

This Use of System Agreement tends to mirror the terms of the DCUSA, but is a bilateral agreement for each new site involving both the DNO and the CVA registrant, which results in extra administrative effort and legal costs both in the initial setting up and for ongoing maintenance should legislation or regulations change.

This Modification Proposal seeks to amend the BSC to place an obligation on CVA registrants connecting directly to Distribution Systems to accede to the DCUSA.

The adoption of this process will save the legal and administrative costs of preparing and maintaining bilateral Use of System Agreements and will give a completely consistent approach across the industry. It

will also make the process of agreeing the terms between the CVA registrants and the DNO more efficient and will introduce better controls around the process

4 Code Specific Matters

Technical Skillsets

Knowledge of the DCUSA

Reference Documents

Distribution Connection and Use of System Agreement

5 Solution

Proposed Solution

Amend the definition of “Connection Agreements” in Annex X-2 to include CVA Registrants.

Include an additional step in BSCP20, Section 3.1 between Refs 3.1.4 and 3.1.5 to check that the CVA Registrant has acceded to the DCUSA.

6 Impacts & Other Considerations

Impacts

Who

BSC Parties that register CVA Connections to Distribution Systems and Distribution System Operators.

Processes

Registration of Metering Systems for Central Volume Allocation

Documents

The Code and BSCP 20

Systems

None

Does this modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

No

Consumer Impacts

None

Environmental Impacts

None

7 Relevant Objectives

Impact of the Modification on the Relevant Objectives:

Relevant Objective	Identified impact
a) The efficient discharge by the Transmission Company of the obligations imposed upon it by the Transmission Licence	Neutral
(b) The efficient, economic and co-ordinated operation of the National Electricity Transmission System	Positive
(c) Promoting effective competition in the generation and supply of electricity and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity	Neutral
(d) Promoting efficiency in the implementation of the balancing and settlement arrangements	Neutral
(e) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency [for the Co-operation of Energy Regulators]	Neutral
(f) Implementing and administering the arrangements for the operation of contracts for difference and arrangements that facilitate the operation of a capacity market pursuant to EMR legislation	Neutral
(g) Compliance with the Transmission Losses Principle	Neutral

This modification will save considerable administrative effort and cost in preparing legal documents and will mean a consistent approach to the Use of System for the parties involved.

8 Implementation Approach

Implementation of this change should be achievable within 6 months of the Panel agreeing that a Workgroup can be formed and the proposal be moved forward.

There will be minimal cost involved in implementation.

9 Legal Text

This will be prepared by the Workgroup

10 Recommendations

Proposer's Recommendation to the BSC Panel

The BSC Panel is invited to:

Agree that PXXX be sent into the Assessment Procedure for assessment by a Workgroup;