



Final CP Report – CP1394

Date	7 October 2013
Purpose of paper	For Information
Summary	This report provides details of the background, solution, impacts, industry views and the SVG's final views on its decision to approve CP1394 'Use of SMETS compliant Meters for Profiling'.

1. Why change?

Background

Profiling is a technique used in Settlement to determine the average Non Half Hourly (NHH) customer's consumption pattern across the Settlement year, for each of eight types of customer (or Profile Classes). These Profiles give the Half Hourly (HH) Settlement Period pattern or 'shape' of usage across a Settlement Day. We create the Profiles for each of these Profile Classes by randomly selecting sites, and then either installing HH capable Meters at these sites or obtaining HH consumption data directly from the relevant Suppliers. These samples are designed to provide Profiles that are representative of all Meters in the Profile Class. [BSC Procedure \(BSCP\) 510](#)¹ sets out the minimum requirements for Metering Systems which are installed for gathering the sample data used in Profiling. Approved Modification [P223](#)² introduced these requirements in 2009.

Suppliers are rolling out HH capable smart Meters that are compliant with the Smart Metering Equipment Technical Specifications (SMETS). There will be a mass rollout of these Meters under the Department of Energy and Climate Change's (DECC's) Smart Metering Implementation Programme (SMIP), which is currently scheduled for late 2015.

The existing requirements in BSCP510 do not match those of the SMETS and would currently preclude the fitting of SMETS-compliant Meters for profiling.

What is the issue?

Suppliers now want to use SMETS-compliant Meters for gathering Profiling data. These 'smart' Meters are HH capable and would provide valid sample data for Settlement.

ELEXON raised CP1394 'Use of SMETS compliant Meters for Profiling' on 4 July 2013 to address this issue.

¹ 'The Provision of Sampling Data to the Profile Administrator'.

² 'Improvements to the Profile Administrator Service'.



2. Solution

Since SMETS-compliant Meters will ultimately be used to provide HH data for Settlement, there is no reason why they cannot be used for Profiling. This simple change will allow Suppliers to fit SMETS-compliant Meters for the purposes of the Profiling sample, increasing the number of Metering Systems that can be used to gather Profiling data.

We therefore propose to extend the minimum metering requirements for Profile capable Metering Systems within BSCP510 Section 4.3³, to include SMETS-compliant Meters.

We also intend to address Housekeeping Changes, which are included in Attachment A.

3. Impacts and costs

Central impacts and costs

CP1394 will require a minor update to BSCP510 with no system impacts.

ELEXON costs and impacts		
Document changes	System changes	Total
BSCP510	No system changes or impacts identified	1 man day's effort, equating to £240 ⁴

Participant impacts and costs

CP1394 does not require participants to take any direct action, but will benefit Suppliers by allowing them to use SMETS-compliant Meters for the Profiling sample.

4. Implementation approach

We recommended that CP1394 is implemented on 26 June 2014 as part of the June 2014 BSC Systems Release.

As part of the CP Impact Assessment, we provided two potential Implementation Dates of either the February 2014 Release or the June 2014 Release. One respondent suggested that the change should be implemented in June 2014 at the same time as Approved Modification [P292](#)⁵; otherwise there were no

³ 'Minimum metering requirements'.

⁴ Includes all activities associated with implementing this proposal.

⁵ 'Amending Supplier & Meter Operator Agent responsibilities for smart Meter Technical Details'.



disagreements for either date. We agree that the number of affected Metering Systems in the interim is likely to be relatively small, so implementing the change in June 2014 would be the most pragmatic option. It also allows for the Code Defined Term for Smart Metering Equipment Technical Specifications, which will be added under P292, to be used rather than including a separate definition in BSCP510 that would be duplicated once P292 is approved.

5. SVG initial views

At its 2 July 2013 meeting ([SVG149](#)), under matters arising, the SVG noted that ELEXON intended to raise CP1394. The SVG did not provide any views or comments at that stage.

6. Industry views

We issued CP1394 for CP Impact Assessment through CPC00729. We received 10 responses, of which nine agreed with the CP (one with a caveat) and one was neutral.

The following table shows the breakdown of responses. You can find the full collated participant responses to CP1394 in Attachment B and on the BSC Website [here](#).

Summary of CP1394 responses			
Organisation	Capacity in which organisation operates (Supplier, Licenced Distribution System Operator (LDSO) etc.)	Agrees?	Impacted?
Association of Meter Operators	Industry association	Yes with caveat	No
BGlobal Metering Limited	HH Data Collector (DC), NHHDC, HH Data Aggregator (DA), NHHDA, HH Meter Operator Agent (MOA) and NHHMOA	Neutral	No
British Gas	Supplier, MOA	Yes	Yes
EDF	Supplier, NHHDC, NHHMOA, HHMOA	Yes	Yes
Electricity North West Limited	LDSO	Yes	No
Npower	Supplier and Supplier Agents (HH & NHH)	Yes	No



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Summary of CP1394 responses			
Organisation	Capacity in which organisation operates (Supplier, Licenced Distribution System Operator (LDSO) etc.)	Agrees?	Impacted?
Scottish Power	Generator, Supplier, LDSO, Supplier Agents	Yes	Yes
SSE	Supplier, NHHMOA, NHHDC	Yes	Yes
TMA Data Management Ltd	HHDC, HHDA, NHHDC and NHHDA	Yes	No
Western Power Distribution	LDSO	Yes	No

Respondents agreed that the CP will benefit Suppliers.

One respondent (EDF) commented that the driver behind the smart Metering rollout is ultimately to alter customers' behaviour. The respondent therefore questioned whether the consumption data from SMETS-compliant Meters would be representative of the wider customer population for the given Profile Class. We note this comment but believe the consumption from these Meters will reflect the wider (and increasing) population of smart metered consumers whose consumption is settled NHH. We agree that wider consideration (outside of this CP) should be given to matching the Profiling sample in line with the ever increasing population of smart Meters during the rollout of these, and we will discuss this with the Profiling Expert Group (PEG) if this CP is approved.

We also note EDF's comment about Suppliers needing the express permission of the customer to obtain HH information from SMETS Meters installed in domestic premises. This requirement refers only to domestic privacy issues and is no different than the existing P223 requirements; hence no further changes to BSCP510 are required.

Comments on the proposed redlining

We received one comment on the redlining, which suggested some re-wording as described in the table below. We agree with the proposed change and do not believe that it is material enough to warrant a second Impact Assessment.

We therefore invited the SVG, when approving CP1394, to agree the revised redlining as shown in Attachment A.



Redlining comments			
Organisation	Document name and location	Comment	ELEXON's recommendation
Association of Meter Operators	BSCP510/4.3	<p>The proposed changes are not in the best place. A SMETS compliant meter also has to be compliant with the MID⁶. A SMETS Compliant meter may (or may not) have functioning communications. Every meter should display 'NHH consumption information'. Schedule 7 of the Electricity Act encompasses approval under MID. Ofgem are no longer responsible for Schedule 7 of the Electricity Act, this responsibility transferred to NMO some years ago.</p> <p>In summary this section needs rewriting. The intent is correct, but the hierarchy is not correct. It might be more appropriate to reword it as follows:</p> <p>"Profile Capable Metering Systems installed in Sample Participant premises shall meet the following minimum requirements:</p> <p>a) Comply with Schedule 7 of the Electricity Act;</p> <p>b) Have the capability for the communications link to be replaced without needing to replace the Meter or invalidating its certification;</p> <p>c) The relevant agent shall obtain the half hourly data by remote access (e.g. GSM); and</p> <p>d) Meet the requirements of SMETS¹ or the selected provisions of the current versions of CoP5, CoP8 and CoP10 as shown in the table below: ..."</p> <p>Don't believe SMETS a defined term in BSC, or should it be linked to</p>	<p>We agree with the suggested amendments as this is clearer and addresses an existing flaw in the hierarchy of requirements.</p> <p>With respects to the footnote defining SMETS, a definition of SMETS will:</p> <ul style="list-style-type: none"> • Best sit in the Definitions section if the CP is implemented in February 2014, which should mirror the definition to be used in Section X Annex X-1 under P292; or • Not be needed if the CP is implemented in June 2014 at the same time as P292, which will implement a definition of SMETS under Section X Annex X-1.

⁶ Metering Instruments Directive.



Redlining comments			
Organisation	Document name and location	Comment	ELEXON's recommendation
		<p>document on www.gov.uk website? Maybe add a footnote to SMETS to say:</p> <p>¹ At the time of the Meter's first installation it should comply with the current version of Smart Metering Equipment Technical Specification (SMETS), as published by DECC or the relevant governance arrangements.</p> <p>Obviously governance of SMETS Is expected to move under the SEC in the years to come, but can't say that until it happens.</p>	

8. Final decision

ELEXON presented CP1394 to the SVG on 1 October 2013 for its approval.

ELEXON outlined the background, solution, impacts and industry views to the SVG on CP1394 ([SVG152](#)). This included ELEXON's recommendation that the SVG should approve CP1394 for implementation in June 2014 rather than the earlier February 2014 Release. We also presented revised redlined changes, which included non-material changes proposed by one respondent that addressed an existing flaw in the hierarchy, which made it clearer.

We invited the SVG to consider the report and to reach a decision on whether to approve the CP and its proposed implementation.

SVG Members had no comments and didn't raise any questions regarding CP1394.

Final decision

The SVG approved CP1394 for implementation on 26 June 2014 as part of the June 2014 BSC Systems Release. The SVG agreed with the proposed amendments to BSCP510, including the revisions (Attachment A).



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Attachments:

Attachment A – CP1394 Approved BSCP510 Redlining v1.0

Attachment B – CP1394 Consultation Responses

For more information, please contact:

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