

Change Proposal Circular – CPC00729 Responses

CPC00729: Impact Assessment of CP1394

Summary of Responses for CP1394

ORGANISATION	Agree with the change?	Impacted?	Cost?	Implementation Date?
Western Power Distribution	Yes	No	-	-
Association of Meter Operators	Yes with caveat	No	-	Agree (Feb-14 or Jun-14)
Npower	Yes	No	-	Agree (Feb-14 or Jun-14)
British Gas	Yes	Yes	-	Agree (Feb-14 or Jun-14)
SSE	Yes	Yes	-	Agree (Feb-14 or Jun-14)
EDF	Yes	Yes	None	Agree (Feb-14 or Jun-14)
Scottish Power	Yes	Yes	-	Suggest June-14, in line with P292
Electricity North West Limited	Yes	No	None	Neutral
BGlobal Metering Limited	Neutral	No	-	Neutral
TMA Data Management Ltd	Yes	No	-	Agree (Feb-14 or Jun-14)

Detailed Impact Assessment Responses CP1394

Organisation	Responses/Comments
Western Power Distribution	Do you agree with the change? (Please provide rationale) "Yes we believe it is acceptable for SMETS compliant meters to be used for profiling purposes."
Association of Meter Operators	Do you agree with the change? (Please provide rationale) "Yes, subject to incorporation of changes described below...a compliant Smart meter should be capable of providing sufficiently accurate HH data"
npower	Do you agree with the change? (Please provide rationale) "Yes we see this as a more reflective approach to customer profiling"
British Gas	How is your organisation impacted? – "Potentially can use SMETS compliant meters to submit consumption information for profiling"
SSE	How is your organisation impacted? – "Minimal"
EDF	Do you agree with the change? (Please provide rationale) "Yes because allowing SMETS meters to be used for profiling purposes will reduce the impact on Suppliers, who will be able to use meters that are being rolled out as part of the smart metering programme for profiling, rather than having to install separate pieces of equipment at additional cost and process complexity. This will also enable Suppliers to call on a much wider population of meters for profiling information which should increase the accuracy of profiling data. However we note that the key driver for the smart metering rollout as per announcements made by DECC is to change consumer

	<p>behaviour in regards to energy consumption. There is therefore a significant question as to whether data gathered from SMETS compliant meters can be regarded as being applicable to the wider population, some analysis of the consumption patterns on SMETS compliant meters should be undertaken to determine if this will create an adverse impact on the accurate allocation of energy prior to implementation.</p> <p>It also needs to be noted that half hourly information can only be obtained from SMETS meters installed in domestic premises with the express permission of the customer.”</p> <p>How is your organisation impacted? – “As a Supplier this will remove or reduce the requirement to install specific metering equipment to meet the obligations in BSCP510, which will reduce the overall costs of meeting our obligations.”</p> <p>What are the associated costs on your organisation to implement the change? – There are no additional costs as these meters will be rolled out anyway as part of the SMIP.</p>
<p>Scottish Power</p>	<p>Do you agree with the change? (Please provide rationale) “Yes as the potential use of accurate HH data can only enhance profiling, this in turn will ultimately benefit the settlement process.”</p> <p>How is your organisation impacted? – “Only to the extent that we need to install a SMETS compliant meter in our sample participants premise and arrange to extract the appropriate data from the SMETS meter.”</p> <p>Agree with the implementation approach? If not, why? – “Yes, however we believe that the change should be implemented in June 2014 at the same time as Modification P292 comes into effect.”</p> <p>Any other comments? “Given that we are talking about a relatively small sample of customers, would it be prudent to install where possible a SMETS compliant meter prior to June 2014 implementation (see Q3 above) for both this change and P292 to</p>

	those participating sample customers in order that profiling and settlement benefit from this additional data at the earliest opportunity. However, we understand that this will require the support of both Suppliers and participating customers.”
Electricity North West Limited	Do you agree with the change? (Please provide rationale “Yes, because it enables the use of more accurate data to be used in Profiling.”

Summary of Comments on BSCP redlining

Organisation	Document name & 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 MID. 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>We agree with suggested amendment as this is clearer and addresses existing flaw in hierarchy.</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 implemented in February 2014; or • not be needed if implemented in June 2014 at the same time as P292, which will implement a definition of SMETS under Section X Annex X-1.

Summary of Comments on BSCP redlining

Organisation	Document name & location	Comment	ELEXON's recommendation
		<p>Profile Capable Metering Systems installed in Sample Participant premises shall meet the following minimum requirements:</p> <ul style="list-style-type: none"> a) Comply with Schedule 7 of the Electricity Act; b) Have the capability for the communications link to be replaced without needing to replace the Meter or invalidating its certification; c) The relevant agent shall obtain the half hourly data by remote access (e.g. GSM); and 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>Don't believe SMETS a defined term in BSC, or should it be linked to document on www.gov.uk website? Maybe add a footnote to SMETS to say:</p>	



Summary of Comments on BSCP redlining

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		<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>	