CP REPORT – CP1411

MEETING NAME	SVG 160
Date of meeting	3 June 2014
Paper number	160/08
Owner/author	Claire Anthony
Purpose of paper	Decision
Classification	Public
Summary	ELEXON invites the SVG to approve CP1411 'Remove exemption from Proving Tests for Code of Practice 10 Metering Systems' for implementation in the June 2015 Release.

1. Why change?

Background

Metering Systems assigned to Code of Practice (CoP) 10 'Metering of Energy via Low Voltage Circuits for Settlement Purposes' are currently exempt from proving tests under both:

- Section 8.3.1 of BSC Procedure (BSCP) 514 'SVA Meter Operations for Metering Systems Registered in SMRS'; and
- Section 4.6.1 of BSCP502 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'.

Change Proposal (CP) 1261 'Introducing Metering Code of Practice 10 to facilitate smart metering in the HH market', which was implemented in February 2009, introduced this exemption.

CoP10 was originally intended to cover whole current Meters for use in the Half Hourly (HH) elective (sub 100kW) market. CP1261 envisaged that CoP5 'Metering of Energy transfers with a maximum demand of up to (and including) 1MW for Settlement purposes' Meters, and hence proving tests, would still be required for secondary current transformer (CT) metering.

CoP10 was later extended to include CT metering under CP1273 'Changes to the scope of CoP10 to cover CT operated Meters', which was implemented in June 2009. The exemption from proving tests for CoP10 Metering Systems was not changed as part of CP1273.

CP1261 sought to make it more viable for Suppliers to move from Non Half Hourly (NHH) to HH without incurring significant costs. To do this it introduced a lower specification CoP (CoP10) and removed the costs of proving tests for whole current Metering Systems, which would not have had to undergo a proving test had they remained NHH.

The Proposer of CP1411 believes that the case for removing barriers to elective HH has moved with the raising of Modification Proposal P272 'Mandatory Half Hourly Settlement for Profile Classes 5-8', as the Proposer believes that a significant number of the CoP10 Meters installed for the mandatory Automatic Meter Reading (AMR) rollout will be settled HH.

What is the issue?

The Issue 49 'Change of Measurement Class (CoMC) process for advanced Meters' Group reviewed the existing CoP10 exemption. A number of Group members were of the view that proving tests should be applied for all HH Metering Systems, whether above 100kW maximum demand or below.

SSE Energy Supply Ltd raised CP1411 'Remove exemption from Proving Tests for Code of Practice 10 Metering Systems' on 20 March 2014 to address this issue.

2. Solution

CP1411 proposes to remove the exemption from proving tests for CoP10 Metering Systems in BSCP514 8.3.1 and BSCP502 4.6.1. Proving tests will then be mandatory for all HH Metering Systems.

Mandating the requirement for a proving test to be successfully completed for these CoP10 Meters would give Suppliers and HH Data Collectors (DCs) confidence that the data being retrieved from the Meter is correct. This is not only for the quality of service provided to the customer in the accuracy of their supply bill, but it would give the appropriate assurances for the integrity and accuracy of data entering Settlement resulting from a large number of these Meters being introduced into the HH market.

3. Impacts and costs

Central impacts and costs

CP1411 will require updates to the following documents, however there are no impacts on BSC Systems:

ELEXON estimated costs and potential impacts		
Document changes	**System changes/impacts**	**Total**
BSCP502 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'	No system changes or impacts	1 man day equating to £240
BSCP514 'SVA Meter Operations for Metering Systems Registered in SMRS'		

Participant impacts and costs

CP1411 will impact Suppliers and HH Meter Operator Agents (MOAs). Eight of the 11 respondents to the CP Impact Assessment indicated an impact. The majority of respondents highlighted that these impacts related to significant process changes for MOAs and their systems.

Four of the 11 respondents to the CP Impact Assessment indicated that there would be costs associated with CP1411. One respondent highlighted that there would be a significant cost impact for Suppliers. For their organisation alone, they estimated that the cost impact would be approximately several hundred thousand pounds. They therefore believed that the impact could be significant across the industry. The same respondent also commented that these costs would ultimately impact customers, when there is pressure to limit customer costs. The respondent therefore recommended further analysis to fully understand the cost impacts of not mandating, versus mandating, proving tests.

4. Implementation approach

CP1411 was originally targeted for implementation on 6 November 2014 as part of the November 2014 BSC Systems Release, as this is the next available Release.

Of the 11 respondents to the CP Impact Assessment, six respondents agreed with the proposed Implementation Date, three disagreed and two were neutral.

The majority of respondents agreed with the proposed Implementation Date. However, respondents commented that, as P272 has been pushed back to an earliest Implementation Date of April 2016, there does not appear to be

any urgency to implement this change in time for November 2014. Respondents also noted that, given the CP's relationship with CP1409 'Change of Measurement Class process for advanced Meters' and CP1410 'Transfer of Outstation Level 3 Passwords for advanced Meters' (also Issue 49 related CPs), it may be worth considering delaying the implementation in order to implement all three changes together.

Attachment C contains the full responses made by participants regarding the proposed Implementation Date.

After considering these responses and those received in relation to CP1409 and CP1410, we believe that it would be more appropriate to implement CP1411 on **25 June 2015** as part of the June 2015 Release. This will allow participants more time to implement the changes.

5. SVG's initial views

ELEXON presented the New CP progression paper for CP1411 to the SVG at its 1 April 2014 meeting (SVG158/04). No comments or questions were received on the CP. However, the SVG asked industry to note that it would not be making its decision on CP1411 until its 3 June 2014 meeting, so respondents should be particularly vigilant when responding to the consultation question on implementation timescales.

6. Industry views

ELEXON issued CP1411 for CP Impact Assessment via CPC00740. We received 11 responses of which six agreed with the CP, two disagreed and three were neutral.

The following table shows the breakdown of responses. You can find the full collated participant responses to CP1411 in Attachment C.

Summary of responses for CP1411			
Organisation	**Capacity in which organisation operates**	**Agree?**	**Impacted?**
British Gas	Supplier, Supplier Agent	Yes	No
EDF Energy	Supplier, Supplier Agent	Yes	Yes
E.ON	Supplier, Supplier Agent	Yes	Yes
IMServ Europe Limited	Supplier Agent	Yes	Yes
Opus Energy	Supplier	No	Yes
RWE Npower	Supplier, Supplier Agent	Neutral	No
ScottishPower	Supplier, Generator, Distributor, Supplier Agent	No	Yes
Siemens Operational Services	Supplier Agent	Neutral	Yes
SSE Energy Supply Ltd	Supplier, Supplier Agent	Yes	Yes

Summary of responses for CP1411			
Organisation	**Capacity in which organisation operates**	**Agree?**	**Impacted?**
SSEPD	Distributor	Neutral	No
TMA Data Management Ltd	Supplier Agent	Yes	Yes

Of the respondents who agreed with the CP, one commented that they agree with the change as it will give both Suppliers and HHDCs the confidence that the data being retrieved from the Meter is correct. The same respondent also noted that, beyond supporting the accuracy of customer billing, it is also important for the integrity and accuracy of data entering Settlement. Another respondent also commented that they are supportive of the change. They believed that proving tests have unearthed discrepancies that commissioning fails to, and so adds to the element of security that a newly installed or commissioned Meter is set up correctly.

Two respondents to the CP Impact Assessment disagreed with the change. One of these respondents commented that they believe the existing Automatic Meter Reading (AMR) portfolio should remain exempt, as any metering faults should have been rectified and the CoMC process should not in itself require a proving test. The other respondent commented that they understand that Settlement accuracy is the main driver for the change. However, they considered that, if CP1411 reverses the exemption in CP1261 which was introduced to remove a barrier to elective HH Settlement for below 100kW sites, then the significant cost impacts for Suppliers (as detailed in Section 3) need to be taken into account.

Does CP1411 apply to existing Meters or to newly installed Meters only?

Three respondents required clarification on whether the requirement for proving tests only applies to newly installed Meters or whether it also applies to existing Meters.

ELEXON advised that, if the exemption for CoP10 is removed, the usual proving test requirements will apply. These are that are that a proving test will be triggered by the events in BSCP514 8.3.1 and the key field changes defined in BSCP514 8.2. These include a CoMC from NHH to HH. Existing CoP10 metering for HH Metering Systems would therefore only require a proving test from the proposed Implementation Date (if the CP is approved) when triggered by specific events. However, CoP10 metering for Profile Class (PC) 5 to 8 Metering Systems would need a proving test as part of any P272 migration. One respondent commented that this would add significant volume to the workload of the HHMOA and HHDC.

Does the change only apply to Meters that can be read remotely?

A respondent requested assurance that only energised Meters and Meters that can be read remotely would be included.

ELEXON advised that the latter is not the case. If the exemption for CoP10 is removed, the existing proving test requirements will apply. For a key field change on a de-energised Meter, BSCP514 8.2 allows the proving test to be delayed until the Meter is re-energised. However, CoP5 and above Metering Systems without operational comms are not currently exempt from proving tests. We have since identified that there is a table in BSCP514 8.3.5 of timescales for proving tests, that needs an entry for CoP10. As such, we will need to update this table in due course for consistency purposes if this CP is approved.

Comments on the proposed redlining

We received no comments on the proposed redlined text for CP1411.

However, we have since identified two identical instances in BSCP502 3.5 (footnote 30) and BSCP502 4.5 where the exemption from proving tests for CoP10 Metering Systems also needs to be removed. ELEXON's recommended changes to the proposed redlined text are highlighted in yellow in Attachment A.

7. Recommendations

Assessment review

CP1411 proposes to remove the exemption from proving tests for CoP10 Metering Systems in BSCP514 8.3.1 and BSCP502 4.6.1 so that proving tests will be mandatory for all HH Metering Systems.

We note that two of the respondents to the CP Impact Assessment disagreed with CP1411.

Although six respondents agreed with the proposed Implementation Date of 6 November 2014, having considered these responses and those received to CP1409 and CP1410, we agree that it would be prudent to move implementation of CP1411 to the June 2015 Release for the reasons outlined in Section 4.

Recommendation

We invite you to:

a) **AGREE** the proposed changes to BSCP502 and BSCP514 for CP1411 (including the amendments made to the BSCP502 redlining following the CP Impact Assessment); and

b) **APPROVE** CP1411 for implementation on 25 June 2015 as part of the June 2015 BSC Systems Release.

Appendices

None

Attachments

Attachment A – BSCP502 Redlining v0.2

Attachment B – BSCP514 Redlining v0.1

Attachment C – CP1411 Consultation Responses

For more information, please contact:

Claire Anthony, Change Analyst

claire.anthony@elexon.co.uk

020 7380 4293

