

Change Proposal – BSCP40/02	CP No: CP1499 <i>Version No: 1.0</i> <i>(mandatory by BSCCo)</i>
Title (mandatory by originator)	
Updates to BSCP537 Appendix 1 ‘Self-Assessment Document’ to incorporate an additional question for Suppliers on Meter Operation Code of Practice Agreement Accreditation for Meter Operator Agents	
Description of Problem/Issue (mandatory by originator)	
<p>Balancing and Settlement Code (BSC) Section J ‘Party Agents and Qualification under the Code’ defines the key functions of a Meter Operator Agent (MOA) as being to install, commission, test, maintain and rectify faults, and provide a sealing service in respect of Metering Equipment (including, if applicable, associated Communications Equipment). This is in accordance with the provisions of BSC Section L ‘Metering’ (except to the extent that BSC Section L and the Codes of Practice (CoP) require the Equipment Owner to perform such activities).</p> <p>BSC Section J also states that a Party shall only appoint and use persons who are Qualified (in respect of the functions to be carried out by that Party Agent). In addition, each Party shall ensure that its Party Agents comply in full with the relevant Qualification Requirements and Qualification Process.</p> <p>At its meeting on 23 February 2017, the Performance Assurance Board (PAB) (PAB193B) raised concerns regarding the Qualification of MOAs providing assurance that applicants could perform these functions. Additionally, Suppliers may be appointing Qualified MOAs with the understanding that they have been qualified to carry out all of the activities covered by the definitions of a MOA in the BSC.</p> <p>The Qualification process is outlined in BSC Section J and BSCP537 ‘Qualification Process for SVA Parties, SVA Party Agents and CVA Meter Operators’. Review by ELEXON of the Self Assessment Document (SAD)¹ forms the basis of the Qualification process in order to identify if the applicant would pose any risk to Settlement and the operation of the BSC.</p> <p>The SAD is split into sections by role sought by the applicant. The Supplier section in the SAD is split into Business Processes and Mitigating Controls. The Supplier is responsible for appointing its agents and managing the performance of its appointed agents. Section 18 (Supplier) of the SAD contains questions about how the Supplier ensures that its agents are meeting their obligation under the BSC.</p> <p>At present, using the questions within the SAD does not provide assurance that the Qualified Person can perform its function as defined in BSC Section L. For example, the ‘front office’ activities such as installation of a Metering System.</p> <p>On 16 June 2017, ELEXON held a discussion with representatives from the Meter Operation Code of Practice Agreement (MOCOPA®), Distribution Connection and Use of System</p>	

¹[BSCP537 Appendix 1 ‘Self-Assessment Document’](#)

Agreement (DCUSA) and the Association of Meter Operators (AMO) to understand the MOA Qualification processes within each organisation and to help find possible gaps in the assurance process for MOAs.

During the discussion it became clear that there needs to be more checks between the codes to provide extra Assurance within MOA Qualification. At present, it appears that various codes do not recognise each other and there is no central list of BSC Qualified and MOCOPA® Accredited MOAs. Therefore Suppliers could be appointing MOAs listed on the [Qualified Person's Workbook](#) without cross checking the [MOCOPA®'s list of Signatories](#).

The responsibility in the BSC remains on the Supplier to ensure that the appointed MOA complies with the requirements of the BSC. The discussion group also recommended adding a question to the SAD to ensure Suppliers have a process in place for checking who the BSC and MOCOPA® Qualified MOAs are.

ELEXON presented a paper to the PAB at its meeting on 30 June 2017 ([PAB197B](#)). This included a recommendation to raise a Change Proposal (CP) to add a question around MOCOPA® Accreditation to BSCP537 - Appendix 1 'SAD' Section 18 (Supplier). The PAB approved the recommendation that a CP should be raised.

Proposed Solution (mandatory by originator)

This CP proposes to add the following question to section 18.1.7 of the SAD to ensure that Suppliers have a process in place when appointing MOAs to ensure that MOAs have completed both the BSC Qualification and MOCOPA® Accreditation processes.

Question:

How will you ensure that the MOA you appoint to a Metering System is Meter Operation Code of Practice Agreement accredited?

The following guidance will also be provided:

The response should demonstrate details of the controls/procedures in place for the ongoing management of your agents, such as:

- *Controls to ensure that the MOA you appoint to a Metering System (or any third party agent used by that MOA to perform certain functions that require that third party agent to be MOCOPA® accredited) is MOCOPA® accredited.*
- *How will monitor that the MOCOPA® accreditation status of the MOA you appoint to a Metering System (or any third party agent used by that MOA to perform certain functions that require that third party agent to be MOCOPA® accredited) is maintained on an ongoing basis?*

The additional question is not checking or monitoring compliance within MOCOPA®; however it is in place to ensure Suppliers appoint MOAs who have obtained their BSC Qualification and MOCOPA® Accreditation.

Justification for Change (mandatory by originator)

The PAB recommended that this CP be raised. Including the additional question in the SAD will provide extra assurance to the industry that Suppliers are aware that they need to check that MOAs obtain both BSC Qualification and MOCOPA® Accreditation, or have a contractual agreement with a MOCOPA® accredited third party agent before appointing them. There is a risk to Settlement if Suppliers are appointing MOAs who are not capable of carrying out the physical aspect of the MOA role such as Meter installation and fault repairs.

The additional question will also encourage more collaboration between BSC and MOCOPA® to ensure adequate monitoring and give Suppliers more visibility of MOAs who have obtained both the BSC Qualification and MOCOPA® full Accreditation.

To which section of the Code does the CP relate, and does the CP facilitate the current provisions of the Code? (mandatory by originator)

BSC Section J ‘Party Agents and Qualification under the Code’

Estimated Implementation Costs (mandatory by BSCCo)

£240 (one ELEXON man day to implement the necessary document changes).

Configurable Items Affected by Proposed Solution(s) (mandatory by originator)

BSCP537 – Appendix 1 ‘Self Assessment Document’

Impact on Core Industry Documents or System Operator-Transmission Owner Code (mandatory by originator)

N/A

Related Changes and/or Projects (mandatory by BSCCo)

[CP1498 ‘Updates to BSCP537 Appendix 1 ‘Self-Assessment Document’ to incorporate an additional question for Meter Operator Agents on Meter Operation Code of Practice Agreement Accreditation’](#)

Requested Implementation Date (mandatory by originator)

28 June 2018 as part of the June 2018 BSC Systems Release

Reason:

This is the next available BSC Release that can include this CP.

Version History (mandatory by BSCCo)

Version 1.0 of CP1499 was issued on 8 January 2018.

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Attachments: Y BSCP537 Appendix 1 - draft redlining (<i>11 pages</i>)