

CP Progression - CP1354

Meeting Name Imbalance Settlement Group (ISG)

Meeting Date 25 October 2011

Purpose of paper For Decision

Summary This report provides details of the background, solution, impacts and industry views of CP1354 'Clarifying commissioning requirements of BSCP537 Qualification Appendix 1: Self Assessment Document (SAD)'. The ISG is requested to consider the report and to reach a decision on whether to approve the CP.

1. Why Change?

1.1 Background

1.2 To become Qualified under the BSC a Meter Operator Agent (MOA) must go through the process set out in BSCP537, 'Qualification Process for SVA Parties, SVA Party Agents and CVA Meter Operators'. This includes completing the Self Assessment Document (SAD) in Appendix 1 of BSCP537. The SAD requires applicants to demonstrate how they ensure that all commissioning tests are conducted to meet the requirements detailed in Code of Practice 4, 'Code of Practice for the Calibration, Testing and Commissioning Requirements of Metering Equipment for Settlement Purposes' (CoP 4), and how they ensure that commissioning records are completed and accurate.

1.3 What is the issue?

1.4 A recent Technical Assurance (TA) check on how Metering System records are managed highlighted non-compliance with aspects of CoP 4 relating to performing and recording commissioning correctly. In particular the check identified:

- MOAs operating incomplete commissioning procedures resulting in Meters being programmed incorrectly and errors in equipment installation leading to Settlement errors.
- Commissioning of parts of the Metering System is sometimes being performed by a third party (rather than the appointed MOA) and the details are not being passed on, creating inefficiencies.

1.5 Parties noted during the TA check that these issues had arisen because the level of expertise of the field workers was falling (through retirement and differing requirements for what is needed to perform the role of Metering Equipment installation and commissioning), particularly when dealing with complex Metering setups. They also felt there was a breakdown of communication between Licensed Distribution System Operators (LDSOs) and/or Equipment Owners and MOAs.

2. Solution

- 2.1 CP1354 was raised on 2 September 2011 by ELEXON. It proposes to amend BSCP537 Qualification Appendix 1 such that:
- the guidance to applicants is clear about the level of communication to be established and maintained with Equipment Owners to ensure full commissioning is performed;
 - further guidance is introduced to ensure that controls and procedures are in place to assess the quality of commissioning test results and records in accordance with CoP 4; and
 - the guidance provided requires applicants to detail how they will transfer documentation to new MOAs when there is a Change of Agent.

3. Industry Views

- 3.1 CP1354 was issued for participant Impact Assessment via CPC00701. We received 6 responses of which 5 agreed, 1 disagreed and 1 was neutral.
- 3.2 The breakdown of responses is shown in the following table and the full collated participant responses to CP1354 are available on the ELEXON website [here](#).

Respondent Role	Respondent Support		
	Yes	No	Neutral
LDSOs	1		
DC/DA/MOA	2		1
Suppliers	0	0	
Mixed (i.e. two or more of Supplier, Generator, Trader, Party agent or Distributor)	2		
Total			

- 3.3 Generally the suggested changes to the SAD were welcomed and seen to provide further assistance to individuals applying to be qualified BSC Meter Operator Agents.
- 3.4 One respondent suggested that similar changes should be included for LDSOs. This respondent noted that the LDSO is virtually always the Equipment Owner of the Current Transformer/Voltage Transformer (CT/VT) equipment, which is an essential part of the Metering Equipment and upon which the Meter Operator is dependent. A recent change to the Meter Operator Code of Practice has made the LDSO always responsible for the CT/VT equipment, which is part of the BSC definition of Metering Equipment.
- 3.5 ELEXON notes that the CP is directed towards BSCP537 and seeks to strengthen the guidance provided to new entrants seeking qualification as SVA Parties, SVA Agents and CVA MOAs. LDSOs are not addressed by this BSCP and therefore changes cannot be introduced into the SAD to include them. The respondent

has been made aware and accepts this but suggests that it would be useful to consider a similar change for LDSOs in the appropriate BSCP.

3.6 Comments on the Proposed Redlining

3.6.1 The following comment on the redlining was received and has been accepted.

Redline Comments			
Organisation	Doc Name and Location	Comment	ELEXON recommendation
IBM (for an on behalf of Scottish Power)	BSCP537 Appendix 1	In 13.1.3, 'including commission records' is inserted. In 14.1.3, 'including commissioning records' is inserted. We would recommend that either one insertion or the other is used for both clauses to ensure clarification and consistency.	Amend 13.1.3 to 'including commissioning records'.

4. Intended Benefits

4.1 The proposed change is intended to help applicants to be more fully aware of their Qualification requirements. It is intended that introducing these amendments into the SAD guidance will reduce instances of commissioning being performed and recorded in an unsatisfactory manner, leading to missing, inaccurate or incomplete data. This can lead to very significant impacts upon Settlement accuracy which this CP seeks to mitigate, e.g. the Trading Disputes Committee processed 23 disputes in the last 24 months where Settlement errors were related to Meters being programmed incorrectly and errors in equipment installation. This was coupled with missing commissioning records, suggesting that the commissioning parts of the Metering System may not have taken place. The Trading Disputes committee upheld 11 of these disputes with a materiality of £609,000.

5. Impacts and Costs

5.1 The following table summarises the ELEXON effort required to implement CP1354 and the Impact on market participants.

Market Participant	Cost/Impact	Implementation time needed
ELEXON (Implementation)	The estimated ELEXON implementation cost is 2 man days of effort, which equates to £480.	23 February 2012.

6. Implementation Approach

6.1 The issue was identified through the Technical Assurance of Performance Assurance Parties check as an area of weakness. The proposed changes would mitigate this weakness and therefore if approved should be implemented in the next possible Release.

7. Recommendations

7.1 We invite you to:

- a) **AGREE** the proposed amendments to BSCP537 'Qualification Appendix 1: Self Assessment Document (SAD)'; and
- b) **APPROVE** CP1354 for implementation on 23 February 2012, as part of the February 2012 Release.

Attachments:

Attachment A – Change Proposal 1354

Attachment B – Redlining BSCP537 Qualification Appendix 1

For more information, please contact:

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Change Proposal – BSCP40/02

CP No: 1354
Version No: 1.0

Title:

Clarifying commissioning requirements of BSCP537 Qualification Appendix 1: Self Assessment Document (SAD)

Description of Problem/Issue:

To become Qualified under the BSC a Meter Operator Agent (MOA) must go through the process set out in BSCP537, 'Qualification Process for SVA Parties, SVA Party Agents and CVA Meter Operators'. This includes completing the Self Assessment Document (SAD) in Appendix 1 of BSCP537. The SAD requires applicants to demonstrate how they ensure that all commissioning tests are conducted to meet the requirements detailed in Code of Practice 4, 'Code of Practice for the Calibration, Testing and Commissioning Requirements of Metering Equipment for Settlement Purposes' (CoP 4), and how they ensure that commissioning records are completed and accurate.

A recent Technical Assurance (TA) check on how Metering System records are managed highlighted non compliance with aspects of CoP 4 relating to performing and recording commissioning correctly. In particular the check identified:

- MOAs operating incomplete commissioning procedures resulting in Meters being programmed incorrectly and errors in equipment installation leading to Settlement errors.
- Commissioning of parts of the Metering System is sometimes being performed by a third party (rather than the appointed MOA) and the details are not being passed on, creating inefficiencies.

Parties noted during the TA check that these issues had arisen because the level of expertise of the field workers was falling (through retirement and differing requirements for what is needed to perform the role of Metering Equipment installation and commissioning), particularly when dealing with complex Metering setups. They also felt there was a breakdown of communication between Licensed Distribution System Operators (LDSOs) and/or Equipment Owners and MOAs.

Proposed Solution:

Amend BSCP537 Appendix 1 as follows:

- Make the guidance to the applicants clear about the level of communication to be established and maintained with Equipment Owners to ensure full commissioning is performed;
- Introduce guidance to ensure that controls and procedures are in place to assess the quality of commissioning test results and records in accordance with CoP 4; and
- Amend the guidance to require applicants to detail how they will transfer documentation to new MOAs when there is a Change of Agent.

Justification for Change:

The proposed change is intended to help applicants to be more fully aware of their Qualification requirements. It is intended that introducing these amendments into the SAD guidance will reduce instances of commissioning being performed and recorded in an unsatisfactory manner, leading to missing, inaccurate or incomplete data. This can lead to very significant impacts upon Settlement accuracy, which this CP seeks to mitigate e.g. the Trading Disputes Committee processed 23 disputes in the last 24 months where Settlement errors were related to Meters being programmed incorrectly and errors in equipment installation. This was coupled with missing commissioning

records, suggesting that the commissioning parts of the Metering System may not have taken place. The Trading Disputes committee upheld 11 of these disputes with a materiality of £609,000.

To which section of the Code does the CP relate, and does the CP facilitate the current provisions of the Code?

The CP better facilitates the provisions of Section L 3.1.2 and 3.6 of the BSC. The proposed changes are intended to strengthen the guidance that applicants receive, increasing the number of commissioning tests that are performed accurately and in a timely, effective manner and improving commissioning records.

Estimated Implementation Costs:

The estimated ELEXON implementation cost is 2 man days of effort, which equates to £480.

Configurable Items Affected by Proposed Solution(s):

BSCP537 Appendix 1: Self Assessment Document.

Impact on Core Industry Documents or System Operator-Transmission Owner Code:

None.

Related Changes and/or Projects:

CP1335 ‘Mandating use of Auxiliary Meter Technical Details Data flow’ also impacts the SAD but relates to the transfer of technical details rather than commissioning and so should not have any impact on this proposal.

CP1351 ‘Improving Half Hourly Metering Equipment commissioning and storage of associated commissioning data’ is also seeking to improve commissioning, but does not impact the SAD.

Requested Implementation Date:

23 February 2012 (February 2012 BSC Release).

Reason:

The issue was identified through the Technical Assurance of Performance Assurance Parties checks as an area of weakness. The proposed changes would mitigate this weakness and therefore if approved should be implemented in the next possible Release.

Version History

We raised version 1.0 of this CP on 2 September 2011.

Originator’s Details:

BCA Name: Melinda Anderson
Organisation: ELEXON
Email Address modifications@elexon.co.uk
Telephone Number: 0207 380 4019
Date: 2 September 2011

Attachments: Yes

Attachment A - Redlined Changes to BSCP537 Appendix 1 (15 pages)

Redlined BSCP537 Qualification Appendix 1 changes for CP1354 'Clarifying commissioning requirements of BSCP537 Qualification Appendix 1: Self Assessment Document (SAD)'

The CP proposes changes to BSCP537 Qualification Appendix 1 sections: 13.1.3, 13.1.8, 14.1.3 and 14.1.8

We have redlined these changes against version 9.0 of the BSCP.

SECTION 13 – SVA HHMOA

Objectives of this section

The objective of this section is to consider the controls that have been built into the systems and processes supporting your SVA HHMOA Agency Service to ensure the requirements of the BSC, BSCP514, BSCP550 and PSL100 are met. Whilst Sections 1 to 7 of the SAD are generic to all Agency Services, this section focuses on the specific controls required to operate effectively as a SVA HHMOA Agent.

Guidance for completing this section

The SVA HHMOA is responsible for the installation and maintenance of half hourly Metering Systems. The SVA HHMOA is required to provide requested data to other Parties and to inform Parties impacted by any changes made to Metering Systems as set out in BSCP514 and BSCP550. The section is split as follows:

Business Processes and Mitigating Controls: This section looks at the controls over the input of Metering System technical data or energisation status data received and the transmission of Metering System technical data, energisation status or Meter reads to HHDC Agents. It also considers the maintenance of standing data (which, if incorrect, may impact upon Settlement), the provision for a full audit trail history of the data used by your Agency Service and any changes made to it as outlined BSCP514 and in PSL100.

Exception Management: The section looks at the specific controls you have in place to report on, monitor and resolve exceptions during the processing of your data.

A number of questions in the SAD relate to ‘data quality’. In this section of the SAD you are concerned with the on-going quality of your data when your Agency Service is live and in operation. The quality of the data used to initially populate your Agency Service is considered in Section 7 of the SAD. A number of the questions in the service specific sections of the SAD relate to how you will ensure the accuracy of incoming and outgoing data and in the event that poor quality data does enter your Agency Service, how you identify and resolve this to minimise the impact upon other Parties and Party Agents.

Both system and manual controls should be considered when answering the SAD questions as your Agency Service will rely on both system and manual processes to effectively fulfil its obligations. Responses should consider the procedures in place for dealing with electronic flows received via the DTN and also manual data flows received via any other means e.g. email, fax, letter.

13.1 Business processes and mitigating controls

Question	Guidance	Response	Evidence
<p>13.1.1 How do you ensure that data is received and processed completely accurately and in a timely manner, in line with the requirements of BSCP514, BSCP550 and PSL100?</p>	<p>The SVA HHMOA receives a number of key inputs:</p> <ul style="list-style-type: none"> (1) D0155, D0151, D0148 from Suppliers relating to appointments and Party Agent changes. (BSCP514 5.2.1, 5.2.2, 5.2.3, 5.2.4, 5.2.5, 5.2.6, 7.1, 7.2, 7.3 and 7.4). (2) D0170 from Suppliers, NHHDCs and other Metering System Operators requesting Metering System details. (BSCP514 5.2.1, 5.2.4, 5.2.5, 5.2.6, 7.3 and 7.4). (3) D0268, D0289, D0149, D0150, D0010 and D0215 from Suppliers, other Metering System Operators and LDSOs providing Metering System technical details or Metering System readings. (BSCP514 5.2.1, 5.2.2, 5.2.3, 5.2.4, 5.2.5, 5.3.5, 7.1, 7.2, 7.3 and 7.4). (4) D0134 and D0139 from Suppliers, other Metering System operators and LDSOs requesting and providing energisation status changes (BSCP514 5.3.1 and 5.3.2). (5) D0142 from Suppliers requesting installation, removal or changes to Metering Systems (BSCP514 5.3.3 5.3.4, 5.3.6, 7.1, 7.2 and 7.4). <p>The response should address the following areas:</p> <ul style="list-style-type: none"> (a) All flows are identified, reviewed and authorised prior to processing. (b) The validation of data for formats and lengths, e.g. the MSID is valid. (c) The validation of data for its internal 		

Question	Guidance	Response	Evidence
	<p>consistency.</p> <p>(d) Controls in place to ensure that all data required or expected is received. This may be through controls within the update routines or through manual controls.</p>		
<p>13.1.2 How do you ensure that once data has been collected that is has been passed to the appropriate recipient completely, accurately and in a timely manner.</p>	<p>The key inputs received are set out in 13.2.1 and where relevant the SVA HHMOA is required to take the appropriate action which might include, for example, the provision of Metering System technical details and Meter readings to other parties – notably to HHDC Agents.</p> <p>The response should address the following areas:</p> <p>(1) Controls should be in place to ensure that the appropriate action for each request or provision of data is taken, all instructions should be logged and progress monitored to ensure they are actioned in a timely manner.</p> <p>(2). Management should have monitoring controls in place in order to determine whether the appropriate action has been taken in each case.</p> <p>(3) Controls should be in place to ensure that data sent (regardless of method) has been sent to the appropriate recipient, has been authorised for sending and potentially any acknowledgement received has been checked - in an electronic environment these may include:</p> <p>(a) File sequence numbers are maintained to ensure that all are processed and in the correct order.</p> <p>(b) Record counts and check sums are</p>		

Question	Guidance	Response	Evidence
	<p>included in the data transmitted to ensure completeness.</p> <p>(c) Receipt acknowledgements received are checked to ensure completeness of transmission (only relevant where the DTN has not been used).</p>		
<p>13.1.3 What controls do you have in place to ensure that data <u>(including commissioning records)</u> or Meter readings obtained by field operators is recorded completely and accurately in the SVA HHMOA database?</p>	<p>The response should address the following areas:</p> <p>(1) Standard forms/input methodologies should be used to collect and retain data from work schedules.</p> <p>(2) Scheduled work/site visits should be monitored against actual work/site visits performed.</p> <p>(3) Expected data/information to be received from the site visits should be measured against actual data/information received.</p>		
<p>13.1.4 How do you ensure that all installed Metering Systems either conform to the metering Codes of Practice (CoP) or that an appropriate Metering Dispensation has been obtained?</p>	<p>The response should address the following areas:</p> <p>(1) An inventory of all Metering Systems installed should be maintained which specifies all Metering System technical details – where relevant this should be supported by the appropriate certificates and paper work (e.g. CT/VT certificates) and an audit trail should be provided from the inventory to the physical documentation.</p> <p>(2) Controls should be in place to identify Metering Systems that require a dispensation and to monitor the expiry dates of any dispensations held.</p>		

Question	Guidance	Response	Evidence
	(3) An inventory of all Metering Systems which have a dispensation should be maintained, which specifies the duration of each.		
13.1.5 What controls and procedures do you have in place to ensure that the requirements of BSCP533 are met?	<p>The response should address the following:</p> <p>(1) Calculations are in accordance with the calculation guidelines specified in BSCP533 Appendix B PARMS Calculation Guidelines.</p> <p>(2) Submissions are in accordance with BSCP533.</p> <p>(3) Data is submitted in the required file format specification (in accordance with BSCP533 Appendix A PARMS Data Provider File Formats).</p> <p>(4) Controls in place for data validity and completeness.</p> <p>(5) Demonstration of a full understanding of, and capability to fulfil, the obligations and requirements of PARMS.</p>		
13.1.6 How will you ensure that you have appropriate audit trails in place to meet the audit trail requirements as set out in PSL100?	<p>The systems should be capable of reporting (or archived information should be stored so that it is available for enquiry) sufficient information so as to enable a user to obtain, in a timely fashion any changes to standing data held or used by the system.</p> <p>The audit trail and archiving requirements for SVA HHMOA are set out in PSL100 sections 10.2 and 10.3.</p>		
13.1.7 How have you ensured that you can meet the data retention	<p>Section U1.6 sets out the requirements on Parties and their Party Agents to retain Settlement Data for:</p> <p>(1) 28 months after the Settlement Day to which it</p>		

Question	Guidance	Response	Evidence
<p>requirements set out in BSC Section U1.6 and PSL100 sections 10.2 and 10.3?</p>	<p>relates on-line;</p> <p>(2) Until the date 40 months after the Settlement Day to which it relates in an archive; and</p> <p>(3) At the request of the Panel, for more than 40 months if needed for an Extra Settlement Determination.</p> <p>The response should address the following:</p> <p>(a) Controls to ensure that any archived data can be retrieved within 10 Business Days.</p> <p>(b) Systems and procedures to ensure that all data that is retained is in a form in which the data can be used in carrying out a Settlement Run or Volume Allocation Run.</p>		
<p>13.1.8 What controls do you have in place to ensure that all commissioning tests are conducted to meet the requirements detailed in CoP_4; Appendix A?</p>	<p>The response should address the following areas:</p> <p>(1) <u>Contacts and communication lines that are established and maintained with the Equipment Owner (Section L 3.1.2) to ensure that full commissioning can be performed in accordance with CoP 4.</u></p> <p>(2) Controls and procedures should be in place to identify all circumstances where a commissioning test is required.</p> <p>(3) All commissioning tests are performed in a timely manner (e.g. where applicable, prior to registration).</p> <p>(4) <u>Controls and procedures which exist to assess the quality of commissioning test results and records.</u></p> <p>(5) All relevant documentation is retained and is</p>		

Question	Guidance	Response	Evidence
	<p>available for retrieval.</p> <p>(46) <u>Detail how you will</u> transfer of documentation to the new SVA HHMOA on CoA.</p> <p>(57) Commissioning tests performed meet the requirements detailed in CoP 4, Appendix A.</p>		

SECTION 14 – SVA NHHMOA

Objectives of this section

The objective of this section is to consider the controls that have been built into the systems and processes supporting your SVA NHHMOA Agency Service to ensure the requirements of the BSC, BSCP514 and PSL100 are met. Whilst Sections 1 to 7 of the SAD are generic to all Agency Services, this section focuses on the specific controls required to operate effectively as a SVA NHHMOA.

Guidance for completing this section

The SVA NHHMOA is responsible for the installation and maintenance of non half hourly Metering Systems. The SVA NHHMO is required to provide requested data to other Parties and to inform Parties impacted by any changes made to Metering Systems as set out in BSCP514. The section is split as follows:

Business Processes and Mitigating Controls: This section looks at the controls over the input of Metering System technical data or energisation status data received and the transmission of Metering System technical data, energisation status or Meter reads to NHHDC Agents. It also considers the maintenance of standing data (which, if incorrect, may impact upon Settlement), the provision for a full audit trail history of the data used by your Agency Service and any changes made to it as outlined in BSCP514 and PSL100.

Exception Management: The section looks at the specific controls in place to report on, monitor and resolve exceptions during the processing of data.

A number of questions in the SAD relate to ‘data quality’. In this section of the SAD you are concerned with the on-going quality of your data when your Agency Service is live and in operation. The quality of the data used to initially populate your Agency Service is considered in Section 7 of the SAD. A number of the questions in the service specific sections of the SAD relate to how you will ensure the accuracy of incoming and outgoing data and in the event that poor quality data does enter your Agency Service, how you identify and resolve this to minimise the impact upon other Parties and Party Agents.

Both system and manual controls should be considered when answering the SAD questions as your Agency Service will rely on both system and manual processes to effectively fulfil its obligations. Responses should consider the procedures in place for dealing with electronic flows received via the DTN and also manual data flows received via any other means e.g. email, fax, letter.

14.1 Business processes and mitigating controls

Question	Guidance	Response	Evidence
<p>14.1.1 How do you ensure that data is received and processed completely accurately and in a timely manner, in line with the requirements of BSCP514 and PSL100?</p>	<p>The SVA NHHMOA receives a number of key inputs:</p> <ol style="list-style-type: none"> (1) D0155, D0151, D0148 from Suppliers relating to appointments and Party Agent changes (BSCP514 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 7.1, 7.2, 7.3 and 7.4). (2) D0170 from Suppliers and other Meter Operators requesting Metering System details (BSCP514 6.2.1, 6.2.4, 7.1 and 7.2). (3) D0149, D0150, D0010, D0268, D0291 and D0215 from Suppliers, other Metering System Operators and LDSOs providing Metering System technical details or Meter readings (BSCP514 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.3.3, 6.3.4, 6.3.5, 7.1, 7.2, 7.3 and 7.4). (4) D0134 and D0139 from Suppliers, other Metering System operators and LDSOs requesting and providing energisation status changes (BSCP514 6.3.1 and 6.3.2). (5) D0142 from Suppliers requesting installation, removal or changes to Metering Systems (BSCP514 6.2.2, 6.3.3, 6.3.4, 7.3 and 7.4). <p>The response should address the following areas:</p> <ol style="list-style-type: none"> (1) All flows are identified, reviewed and authorised prior to processing. (2) The validation of data for formats and lengths, e.g. the MSID is valid. (3). The validation of data for its internal consistency. 		

Question	Guidance	Response	Evidence
	<p>(4) Controls in place to ensure that all data required or expected is received. This may be through controls within the update routines or through manual controls.</p>		
<p>14.1.2 How do you ensure that once data has been collected that it has been passed to the appropriate recipient completely, accurately and in a timely manner.</p>	<p>The key inputs received are set out in 14.2.1 and where relevant the SVA NHHMOA is required to take the appropriate action which might include the provision of Metering System technical details and Meter readings to other parties – notably to NHHDC Agents.</p> <p>The response should address the following areas:</p> <p>(1) Controls should be in place to ensure that the appropriate action for each request or provision of data is taken, all instructions should be logged and progress monitored to ensure they are actioned in a timely manner.</p> <p>(2) Management should have monitoring controls in place in order to determine whether the appropriate action has been taken in each case.</p> <p>(3) Controls should be in place to ensure that data sent (regardless of method) has been sent to the appropriate recipient, has been authorised for sending and potentially any acknowledgement received has been checked - in an electronic environment these may include:</p> <p>(a) File sequence numbers are maintained to ensure that all are processed and in the correct order.</p> <p>(b) Record counts and check sums are included in the data transmitted to ensure</p>		

Question	Guidance	Response	Evidence
	<p>completeness.</p> <p>(c) Receipt acknowledgements received are checked to ensure completeness of transmission.</p> <p>(d) Processes are in place to re-send transmissions should a failure occur.</p>		
<p>14.1.3 What controls do you have in place to ensure that data <u>(including commissioning records)</u> or Meter readings obtained by field operators are recorded completely and accurately in the SVA NHHMOA database and in a timely manner?</p>	<p>The response should address the following areas:</p> <p>(1) Standard forms/input methodologies should be used to collect and retain data from work schedules.</p> <p>(2) Scheduled work/site visits should be monitored against actual work/site visits performed.</p> <p>(3) Expected data/information to be received from the site visits should be measured against actual data/information received.</p>		
<p>14.1.4 How do you ensure that all installed Metering Systems either conform to the metering Code of Practice or that an appropriate Metering Dispensation has been obtained?</p>	<p>The response should address the following areas:</p> <p>(1) An inventory of all Metering Systems installed should be maintained which specifies all Metering System technical details – where relevant this should be supported by the appropriate certificates and paper work (e.g. CT/VT certificates) and an audit trail should be provided from the inventory to the physical documentation.</p> <p>(2) Controls should be in place to identify Metering Systems that require a dispensation and to monitor the expiry dates of any dispensations held.</p>		

Question	Guidance	Response	Evidence
	(3) An inventory of all Metering Systems which have a dispensation should be maintained which specifies the duration of each.		
14.1.5 What controls and procedures do you have in place to ensure that the requirements of BSCP533 are met?	<p>The response should address the following:</p> <ul style="list-style-type: none"> (1) Calculations are in accordance with the calculation guidelines specified in BSCP533 Appendix B PARMS Calculation Guidelines. (2) Submissions are in accordance with BSCP533. (3) Data is submitted in the required file format specification (in accordance with BSCP533 Appendix A PARMS Data Provider File Formats). (4) Controls in place for data validity and completeness. (5) Demonstration of a full understanding of, and capability to fulfil, the obligations and requirements of PARMS. 		
14.1.6 How have you ensured that you have appropriate audit trails in place to meet the audit trail requirements as set out in PSL100?	<p>The systems should be capable of reporting (or archived information should be stored so that it is available for enquiry) sufficient information so as to enable a user to obtain, in a timely fashion any changes to standing data held or used by the system.</p> <p>The audit trail and archiving requirements for SVA NHHMOA are set out in PSL100 sections 10.2 and 10.3.</p>		
14.1.7 How have you ensured that you can meet the data retention	<p>Section U1.6 sets out the requirements on Parties and their Party Agents to retain Settlement Data for:</p> <ul style="list-style-type: none"> (1) 28 months after the Settlement Day to which it 		

Question	Guidance	Response	Evidence
<p>requirements set out in BSC Section U1.6 and PSL100 section 10.2 and 10.3?</p>	<p>relates on-line;</p> <p>(2) Until the date 40 months after the Settlement Day to which it relates in an archive; and</p> <p>(3) At the request of the Panel, for more than 40 months if needed for an Extra Settlement Determination.</p> <p>The response should address the following:</p> <p>(a) Controls to ensure that any archived data can be retrieved within 10 Business Days.</p> <p>(b) Systems and procedures to ensure that all data that is retained is in a form in which the data can be used in carrying out a Settlement Run or Volume Allocation Run.</p>		
<p>14.1.8 What controls do you have in place to ensure that all commissioning tests are conducted to meet the requirements detailed in CoP 4; Appendix A?</p>	<p>The response should address the following areas:</p> <p>(1) <u>Contacts and communication lines that are established and maintained with the Equipment Owner (Section L 3.1.2) to ensure that full commissioning can be performed in accordance with CoP 4.</u></p> <p>(2) Controls and procedures should be in place to identify all circumstances where a commissioning test is required.</p> <p>(3) All commissioning tests are performed in a timely manner (e.g. where applicable, prior to registration).</p> <p>(4) <u>Controls and procedures which exist to assess the quality of commissioning test results and records.</u></p> <p>(5) All relevant documentation is retained and is</p>		

Question	Guidance	Response	Evidence
	<p>available for retrieval.</p> <p>(46) <u>Detail how you will transfer</u> of documentation to the new SVA HHMOA on CoA.</p> <p>(57) Commissioning tests performed meet the requirements detailed in CoP 4, Appendix A.</p>		