CPC00661 – Impact Assessment Responses for CP1288, CP1289, CP1290, CP1291 and CP1292

CP1288 - Revisions to Meter test points within Code of Practice 4

Summary of Responses

Organisation	Capacity in which Organisation operates in	Agreement Yes/No	Days Required to Implement
EON	NORW, EELX, EENG, EMEB, PGEN	Yes	-
British Energy	Generator, Supplier, Trader Non-Physical	Yes	-
EDF Energy	Supplier, NHH Agents and HH MOP	Yes	30
E.ON UK Energy Services Limited	MOA HNHH DC/DA	Yes	-
ScottishPower	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes	0
NPower Limited	Supplier, Supplier Agents	Yes	-
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	0
TMA data Management Ltd	HHDC, HHDA, NHHDC, NHHDA	Neutral	-
IPNL	LDSO, SMRA, UMSO	Neutral	-
Cewe Instrument AB	CoP 1, CoP2, CoP3 and CoP5 metering supplier	-	30

Detailed Impact Assessment Responses

Organisation	Agreement Yes/No	Comments	Impact Yes/No
British Energy	Yes*	**Comments:** Proposed changes are agreed subject to minor additions. Other changes are essential to facilitate full CoP4 compliance. See "Other Comments" below for details. **Capacity in which Organisation is impacted** (e.g. Supplier, HHDC, etc) Generator **Impact on Organisation** (e.g. systems/process changes): Removal of CoP4 test requirements which cannot be met.	Yes

		Changes would apply immediately starting with the next set of planned calibrations Would implementation in the proposed Release have an adverse impact? (please state impact) Current CoP4 requirements cannot be met in full. Changes are required a.s.a.p. **Costs:** Fixed contractual charges are currently being paid for less than 100% compliant Type A and C calibrations. Assuming all required changes are implemented, the same payments will cover fully compliant tests. **Other Comments:** There are no meters in existing British Energy metering systems which carry a single phase load - all meters are employed in balanced-load circuits. This means that although the proposed changes address issues which do not currently concern BE, they exclude the removal of current CoP4 requirements which cannot be met by BE, our metering support Contractor, meter manufacturer (Cewe) or nominated UK Test House. These relate to the Type A and C calibration requirements for single element-only testing. Bearing in mind single element operation with 3 phase 4 wire meters would be extremely unlikely (with the chances of such operation being even less with 3 phase 3 wire meters - as used by BE), BE have serious reservations about the justification or the need for this.	
EDF Energy	Yes	**Comments:** See document review comments below. **Capacity in which Organisation is impacted:** MOP **Impact on Organisation :** Process changes **Implementation: No. of Calendar Days 30** **Would implementation in the proposed Release have an adverse impact? (please state impact)** No – provided notice given is sufficient.	Yes
E.ON U.K. Energy Service Ltd	Yes	**Comments**: This change will reduce the potential for confusion **Impact**: No changes to established processes will be required.	No

ScottishPower	Yes	Update to internal processes	No
NPower Limited	Yes	**Comments**: As discussed between Elexon and the Originator Lorna Short (NPower), it was agreed that that a couple of examples within the Change Proposal would aid clarification. Please see details below. Below table C1(a) For example the maximum permitted error at I_{max} and unity power factor for a class 0.2s meter is +/- 0.2% when the meter is being tested under balanced load conditions and +/- 0.3% under single phase load conditions. This would allow an overall difference of 0.5% but the additional requirement limits this to 0.4% for a class 0.2s meter. Below table C3(a) For example the maximum permitted error at I_n and sin φ=1 for a class 2 meter is +/- 2.0% when the meter is being tested under balanced load conditions and +/- 3.0% under single phase load conditions. This would allow an overall difference of 5.0% but the additional requirement limits this to 2.5% for a class 2.0 meter.	No
Cewe Instrument AB		**Comments:** The main comment is that the vector diagram is not consistent with most international metering standards (EN62053-23 etc). To assist in understanding and reduce miss-interpretation it is preferable to use a consistent standard so all manufacturers, generators and energy suppliers use the same vector diagram. It would also be helpful if angular displacement from active power unity is given (e.g. 0 = unity pf active power, +60 0.5 inductive power factor (active energy), -60 0.5 capacitive power factor (active energy), 90 = reactive import etc. Is it also realistic to have single phase load points on 3ph 3wire systems? **Capacity in which Organisation is impacted** : We are a supplier and would like to be completely clear as to the exact measurement points required for the type A calibration for CoP1 and CoP2 meters. **Impact on Organisation**: Test systems need to be reprogrammed to accommodate	Yes

		any changes from existing interpretation. **Implementation**: 30 **Comments** Time to change our calibration systems which are now tailored to UK CoP4 requirements. **Would implementation in the proposed Release have an adverse impact?** (please state impact) We would have to submit our interpretation and seek approval from Elexon, for Type A calibration points. **Costs:** Minimal costs are envisaged (1 man day), the important thing is to have a consistent vector diagram so we only need to do the job once.	

Comments on redline text

No.	Organisation	Document name (e.g. BSCPXXXX/CoPX)	Location (Section and paragraph numbers)	Severity Code (H/M/L – see below)	Comments by Reviewer
1	Cewe Instrument AB	CoP4	App 1 table B1 vector diagram	H	Internationally recognised standard diagram to be used.
2	Cewe Instrument AB	CoP4	App 1 Table B1	M	Are single phase load points required for 3ph 3wire networks?
3	British Energy	CoP4	Tables B1, B2, B3, B4, B5	M	For consistency with proposed changes to the headings for Reactive Meters and Active meters on Table C1(a), and with existing headings on Tables C1 & C2, it is suggested the headings for Active meters be amended to include reference to "(Cos Ø)"
4	British Energy	CoP4	Table C3	M	For consistency with proposed additions to the headings for Tables C1 and C2, it is suggested the heading for Table C3 should include "(single-phase Meters and polyphase Meters with balanced loads)"
5	British Energy	CoP4	Table B1 (and B2 for any Type CEP/CEQ	H	While there is no requirement for Type B meter calibrations to include a single element-only test, Type A calibrations currently require such tests. In practice however, although Cewe's newer, intelligent meters can be (and

			meters installed on CoP 3, 5, 6 or 7 metering systems)		are) issued with certificates including these points, Cewe do not have the facility to do the same with the older CEP/CEQ type meters (the 'test rig' used for this meter type has software that cannot do it, and cannot be changed or updated). Therefore, Type A calibration certificates do not and cannot include these points. Given the above, BE suggests that unless test "Y" is removed, neither we nor any other party who use Cewe to carry out Type A calibrations on CEP/CEQ meters can comply fully with CoP4 requirements.
6	British Energy	CoP4	Table B4	H	While there is no requirement for Type B meter calibrations to include a single element-only test, Type C calibrations currently require such tests. In practice however, BE's nominated UK Test House has advised (i) that a single element test of Type CEP/CEQ meters would be technically very difficult, (ii) would require significant changes to their test system, (iii) would give results with high levels of uncertainty, and (iv), since BE has no compensation calculations for single element operation, they would be unable to set up their test equipment correctly. Finally, since there is no Type A calibration data with which to compare the results (as indicated in Item 3 above), they (and BE) believe these tests would serve no useful purpose. Given the above, BE suggests that unless test "Y" is removed, neither we nor any other party with CEP/CEQ meters can comply fully with CoP4 requirements for Type A calibrations.
7	EDF Energy	Cop4	Table C1(a)	H	Having discussed with originator we feel that the following should be added below this table: "For example the maximum permitted error at I_{max} and unity power factor for a class 0.2s meter is +/- 0.2% when the meter is being tested under balanced load conditions and +/- 0.3% under single phase load conditions. This would allow an overall difference of 0.5% but the additional requirement limits this to 0.4% for a class 0.2s meter."
8	EDF Energy	Cop4	Table C3(a)	H	Having discussed with originator we feel that the following should be added

					below this table: "For example the maximum permitted error at I_n and sin φ=1 for a class 2 meter is +/- 2.0% when the meter is being tested under balanced load conditions and +/- 3.0% under single phase load conditions. This would allow an overall difference of 5.0% but the additional requirement limits this to 2.5% for a class 2.0 meter."

CP1289 - Correction to the Level 4 password requirement in Code of Practice 2

Summary of Responses

Organisation	Capacity in which Organisation operates in	Agreement Yes/No	Days Required to Implement
EON	NORW, EELX, EENG, EMEB, PGEN	Yes	-
British Energy	Generator, Supplier, Trader Non-Physical	Yes	-
EDF Energy	Supplier, NHH Agents and HH MOP	Yes	-
E.ON UK Energy Services Limited	MOA HNHH DC/DA	Yes	-
ScottishPower	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes	-
NPower Limited	Supplier, Supplier Agents	Yes	-
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	0
TMA data Management Ltd	HHDC, HHDA, NHHDC, NHHDA	Neutral	-
IPNL	LDSO, SMRA, UMSO	Neutral	-

Detailed Impact Assessment Responses

Organisation	Agreement Yes/No	Comments	Impact Yes/No
NPower Limited	Yes	Process Impact Only	-
E.ON U.K. Energy Service Ltd	Yes	**Comment**: The changes outlined will remove the potential for confusion	No
ScottishPower	Yes	**Impact**: Updates to internal documentation and processes	Yes

CP1290 - Rationalise and Simplify Unmetered Supplies requirements following a review by an Expert Group

Summary of Responses

Organisation	Capacity in which Organisation operates in	Agreement Yes/No	Days Required to Implement
IPNL	LDSO, SMRA, UMSO	Yes	-
Power Data Associates Ltd	Meter Administrator	Yes	30
EON	NORW, EELX, EENG, EMEB, PGEN	Yes	-
EDF Energy	Supplier, NHH Agents and HH MOP	Yes	-
Central Networks	UMSO	Yes	0
ScottishPower	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes	30
NPower Limited	Supplier, Supplier Agents	Yes	-
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	0
TMA data Management Ltd	HHDC, HHDA, NHHDC, NHHDA	Neutral	-
British Energy	Generator, Supplier, Trader Non-Physical	Neutral	-

Detailed Impact Assessment Responses

Organisation	Agreement Yes/No	Comments	Impact Yes/No
IPNL	Yes	IPNL supports the proposal as it provides clarity to the code thus making it easier for MAs and new market entrants to understand their requirements.	No
Power Data Associates Ltd	Yes	**Comments**: The three UMS changes to BSCP520 are the result of a detailed review by an expert group. The review was prompted by BSC audit issues revealing considerable ambiguity, which has led to a wide diverge between the BSCP and actual practice. It is important that these changes are approved to improve the quality of UMS settlement data. **Impact on Organisation**: Revision to operational documentation	Yes
Central Networks	Yes	**Comments:** Central Networks supports these changes as they will bring greater clarity to BSCP520 and the associated Unmetered Supplies processes. **Impact:** No	No

ScottishPower	Yes	**Comments:** Though ScottishPower agrees with and supports the CP we feel that reference to the statutory document as well as the description contained therein should be retained within the BSCP520 section 1.1 rather than only directing the reader to the statutory document. As the BSCP is the main source of the arrangements for UMS trading we believe the sector would be best served by continuing to include what constitutes an UMS connection within the BSCP. We appreciate that this will result in an additional overhead to ensure consistency between the two documents but see no reason not to retain the description in the BSCP. **Capacity in which Organisation is impacted:** Supplier, UMSO, HHDC, HHDA **Impact**: Internal Documentation changes **Implementation** 30 WD	Yes
NPower Limited	Yes	**Impact**: Process Impact Only	Yes
Scottish and Southern Energy	Yes	**Comment**: Although we agree with the rationale to simplify the requirements - our main concern with the proposed changes is the referencing of the SI 2001 No 3263 to the clause 1.1 Scope and Purpose of Responsibilities. The SI wordings should not be deleted from the BSCP 520 as it makes it easier for customers and UMS operational staff to understand what they can and can't install. We believe that just having yet another reference, will actually add complexity to the requirements causing confusion to all concerned (especially customers), having to track down and read through yet another document.	-

Comments on redline text

No.	Organisation	Document name (e.g. BSCPXXXX/CoPX)	Location (Section and paragraph numbers)	Severity Code (H/M/L – see below)	Comments by Reviewer
1	Power Data Associates Ltd	BSCP520	All		Not attempted to check all the cross references, particularly as these may differ if one or all of the changes are agreed.

CP1291 - Clarify requirements on Meter Administrators relating to Equivalent Meters

Summary of Responses

Organisation	Capacity in which Organisation operates in	Agreement Yes/No	Days Required to Implement
Power Data Associates Ltd	Meter Administrator	Yes	30
EON	NORW, EELX, EENG, EMEB, PGEN	Yes	-
EDF Energy	Supplier, NHH Agents and HH MOP	Yes	-
Central Networks	UMSO	Yes	0
ScottishPower	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes	30
NPower Limited	Supplier, Supplier Agents	Yes	-
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	0
TMA data Management Ltd	HHDC, HHDA, NHHDC, NHHDA	Neutral	-
IPNL	LDSO, SMRA, UMSO	Neutral	-
British Energy	Generator, Supplier, Trader Non-Physical	Neutral	-

Detailed Impact Assessment Responses

Organisation	Agreement Yes/No	Comments	Impact Yes/No
Power Data Associates Ltd	Yes	**Comment:** The three UMS changes to BSCP520 are the result of a detailed review by an expert group. The review was prompted by BSC audit issues revealing considerable ambiguity, which has led to a wide diverge between the BSCP and actual practice. It is important that these changes are approved to improve the quality of UMS settlement data. **Impact:** Revision to operational documentation	Yes
Central Networks	Yes	**Comment**: Central Networks welcomes these changes which will provide greater clarity surrounding Unmetered Supplies processing. We particularly welcome the introduction of timescales surrounding the processing of summary inventories and	No

		resolution of data inaccuracies. **Impact**: None **Implementation Notification required**: 0 - No change to existing processes	
ScottishPower	Yes	**Comment**: ScottishPower supports the proposed changes to the BSCP520. The proposed changes will assist and improve clarity of the BSCP. **Impact**: Internal process and documentation changes	Yes
NPower Limited	Yes	Process Impact Only	Yes

Comments on redline text

No.	Organisation	Document name (e.g. BSCPXXXX/CoPX)	Location (Section and paragraph numbers)	Severity Code (H/M/L – see below)	Comments by Reviewer
1	Power Data Associates Ltd	BSCP520	Current 1.2.4.4	M	The MA shall use only an Equivalent Meter (i.e. whether passive or dynamic) permitted for use within the relevant GSP Group by the LDSO. *The bracket is already included in 1.2.1 (e) and it would be appropriate to repeat it here.*
2	Power Data Associates Ltd	BSCP520	4.5.1	M	Note: The EM will log all switching actions to at least the nearest minute. *Lailoken captures switching time to the nearest second, would not wish to be at conflict with this requirement when Lailoken is being more accurate.*
3	Power Data Associates Ltd	BSCP520	3.1.5	M	*The note refers to 'dummy MOA' should this not be the UMSO or MA as per 1.3.7 & 1.3.8. I suggest the note is deleted.*
4	Power Data Associates Ltd	BSCP520	3.1.7	L	When: On Customer or Supplier request. *At working group we agreed this normally was triggered by the customer, but it may be triggered by supplier.*

5	Power Data Associates Ltd	BSCP520	3.1.7	M	Request from the UMSO the type of EM and the location, if any, of the PECU arrays(s) and other factors relevant to the PECU Array Siting Procedure in 4.5.1.1 *As this process is for a new inventory it is unlikely there will be an array, but the UMSO could provide the relevant information.*
6	Power Data Associates Ltd	BSCP520	3.2.2	M	*We want a step (when box statement) that requires the UMSO to review the inventory provided by the customer within 5WD of receipt – they may reject it back to the customer (with reasons), or accept it – but they should not 'sit on it' for weeks. With some UMSOs, this delay is causing many inventories to be backdated weeks/months – which puts additional work on MA, HHDC, Supplier & customer, as well as settlement error.*
7	Power Data Associates Ltd	BSCP520	3.2.4	M	The 'when box should be deleted and replaced with that of 3.1.13
8	Power Data Associates Ltd	BSCP520	3.3.1.3	M	*Need to be consistent here, the is the agreement between UMSO & Supplier or UMSO and MA? I think the MA.*
9	Power Data Associates Ltd	BSCP520	3.3.1.7 to 3.3.1.9	M	*These steps (as a new MA) should be the same as 3.1.12 to 3.1.16*
10	Power Data Associates Ltd	BSCP520	3.4.3	M	*These steps (as a new MA) should be the same as 3.1.12 to 3.1.16*
11	Power Data Associates Ltd	BSCP520	All		Not attempted to check all the cross references, particularly as these may differ if one or all of the changes are agreed.
12	Scottish Power	BSCP520	3.1.8	L	The redlined text states "With 5WD of 3.1.7" Should this be 'within' rather than 'with'.
13	Scottish Power	BSCP520	3.2.4 / 3.3.1	L	The current redlined text does not read well "Reject listing invalid codes to the UMSO and continue to use or re-apply previous inventory." Propose it should be changed to

					"Reject updated summary inventory listing invalid codes to the UMSO and continue to use or re-apply previous inventory."
14	Scottish Power	BSCP520	3.3.13	L	The current text reads Agree with Supplier the type of EM and the location, if any, of the PECU array(s) accordance with the provision of the PECU Array siting procedures in 4.5.1.1. It should read Agree with Supplier the type of EM and the location, if any, of the PECU array(s) in accordance with the provision of the PECU Array siting procedures in 4.5.1.1.
15	Scottish Power	BSCP520	Footnote 3 Pp 27	L	The term "CoMC" should be defined within the glossary of BSCP520 as per the undertaking and aim of CP1290

CP1292 - Clarify Meter Administrator requirements relating to PECU arrays

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement Yes/No	Days Required to Implement
Power Data Associates Ltd	Meter Administrator	Yes	30
EON	NORW, EELX, EENG, EMEB, PGEN	Yes	-
EDF Energy	Supplier, NHH Agents and HH MOP	Yes	-
Central Networks	UMSO	Yes	0
ScottishPower	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes	0
NPower Limited	Supplier, Supplier Agents	Yes	-
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	0
TMA data Management Ltd	HHDC, HHDA, NHHDC, NHHDA	Neutral	-
IPNL	LDSO, SMRA, UMSO	Neutral	-
British Energy	Generator, Supplier, Trader Non-Physical	Neutral	-

Detailed Impact Assessment Responses

Organisation	Agreement Yes/No	Comments	Impact Yes/No
Power Data Associates Ltd	Yes	**Comment:** The three UMS changes to BSCP520 are the result of a detailed review by an expert group. The review was prompted by BSC audit issues revealing considerable ambiguity, which has led to a wide diverge between the BSCP and actual practice. It is important that these changes are approved to improve the quality of UMS settlement data. **Impact:** Revision to operational documentation	Yes
ScottishPower	Yes	**Comments:** ScottishPower supports the proposed changes to the BSCP520. The proposed changes will assist and improve clarity of the BSCP. **Impact on Organisation's Systems and/or Processes?** Yes **Capacity** in which Organisation is impacted (e.g. Supplier, HHDC, etc) UMSO, Supplier **Impact on Organisation/process**: Internal documentation changes only	Yes
NPower Limited	Yes	**Impact**: Process Impact Only	Yes

Comments on redline text

No.	Organisation	Document name (e.g. BSCPXXXX/CoPX)	Location (Section and paragraph numbers)	Severity Code (H/M/L – see below)	Comments by Reviewer
1	Power Data Associates Ltd	BSCP520	4.5.1.1	M	…high density of apparatus unless otherwise agreed between the UMSO and the ~~Supplier~~MA. *The earlier changes make the agreement between the UMSO and the MA, then the last agreement is the UMSO and Supplier – this seems inconsistent. This inconsistency remains in other parts of the document.*
2	Power Data Associates Ltd	BSCP520	All		Not attempted to check all the cross references, particularly as these may differ if one or all of the changes are agreed.
3	Central Networks	BSCP520	1.2.1 (f)	L	Typo. Should be "siting" not "citing".
4	Npower	BSCP520	1.2.1 F		"Citing" should be "Siting"