ELEXON

ISG102/01

Meeting name	Imbalance Settlement Group
Date of meeting	28 July 2009
Paper title	Change Proposal Progression
Purpose of paper	For Decision
Synopsis	This paper provides: • 4 Change Proposals (CPs) for decision; and • details of the status of all Open Draft Change Proposals (DCPs) and Change Proposals (CPs)

1 Introduction

1.1 This paper provides details of 4 Change Proposals for you to consider and agree on their progression. ELEXON issued all the CPs for Party/Party Agent impact assessment via Change Proposal Circular (CPC) 00662, with the exception of CP1288 which we issued via CPC00661. In light of these assessments ELEXON invites the ISG to decide whether to approve or reject the CPs.

2 Summary of Change Proposals for decision

2.1 CP1288 – Revisions to Meter test points within Code of Practice 4

2.1.1 Npower raised CP1288 on 21 April 2009. We issued CP1288 for impact assessment (via CPC00661) in May 2009.

2.1.2 CP1288 aims to align the testing provisions in Codes of Practice (CoP)4 with the British Standards and to remove the ambiguity for testing 3 phase Meters[1] by:

- Amending the headings for Reactive Meters in several tables to units of sin φ rather than power factor in Appendix B;
- Inserting a new diagram in Appendix B to clarify the test point requirements for Reactive Meters; and
- Inserting new tables from British Standards BS EN 62053-22 and BS EN 6253-23 into Appendix C.

2.1.3 We received 10 impact assessment responses; of these 7 agreed and 3 were neutral. We received some comments suggesting minor amendments to add clarity to the proposed redline text and recommend that the SVG agree to include them in CP1288.

2.1.4 We note that the changes proposed would mean including information which is taken directly from the British Standards in CoP4. We have confirmed with the British Standards Institution that we may include these extracts, provided we include the wording suggested in row 9 of table 3. We are comfortable with this wording and recommend that the SVG agree that the redline text should be amended to include this as well.

[1] A meter which is capable of more than one voltage supply to a premises.

2.1.5 We recommend that, because aligning the provisions of CoP4 with the British Standards will make the requirements easier to understand for Meter Operators and manufacturers, and majority industry support, you:

- **AGREE** our suggested amendments to the redline text; and
- **APPROVE** CP1288 for implementation in the November 2009 Release.

2.2 CP1296 – Mandatory Capability to Record Reactive Power Demand (kvar) Values in Code of Practice 5 (CoP5) Meters

CP1297 – Mandatory Capability to Record Reactive Power Demand (kvar) Values in Code of Practice 10 (CoP10) Meters

2.2.1 We raised CP1296 and CP1297 on 05 June 2009. We subsequently issued them for impact assessment (via CPC00661) in June 2009.

2.2.2 CP1296 and CP1297 aim to address issues associated with absent and erroneous Reactive Power data. They aim to do this by ensuring that CoP5 (CP1296) and CoP10 (CP1297) Meters are capable of recording Reactive Power values. CoP5 and CoP10 would be amended to reflect these additional requirements.

2.2.3 We received 15 responses in relation to **CP1296**; of these 13 agreed, 1 disagreed and 1 was neutral. The respondents who agreed with the proposal believed that this change would ensure a more effective process of capturing and reporting Reactive Power data. In addition a respondent believed that CP1296 would improve the data quality and lead to more accurate Distribution Use of System (DuoS) charging.

2.2.4 The respondent, who disagreed with CP1296, believed that CoP5 Meters should not be required to record Reactive Export for predominantly Import sites, as this would be an ineffective requirement as there is generally no Reactive Export values to report. Our view, as discussed with the respondent, is that this data will become more important in the future, and that a consistent approach should be followed in order to ensure uniformity within the market. The Reactive Power Working Group who assessed these changes shared this view.

2.2.5 We received 15 responses in relation to **CP1297**; of these 12 agreed and 3 disagreed. The respondents who agreed with the proposal believed that this change would ensure a more effective process of capturing and reporting Reactive Power data. In addition, one respondent believed that this change would enhance their current practice of Reactive Power charging.

2.2.6 The respondents, who disagreed with CP1297, believed that CoP10 Meters should not be required to record Reactive Export values for predominantly Import sites. The rationale for this comment was that there are generally no Reactive Export values to report at these sites and that by including this requirement you would be introducing an ineffective process. In addition some respondents believed that CoP10 had been developed as a 'lighter version' of CoP5 and by including these requirements within CoP10 we would be creating a mirror image of CoP5 which was not the intention behind the development of CoP10. Our view, as discussed with the respondent, was that this data would become more important in the future and that a consistent approach should be followed in order to ensure uniformity within the market. The Reactive Power Working Group who assessed these changes shared this view.

2.2.7 We recommend that, based on the additional benefit of being able to provide accurate Reactive Power data to LDSOs, ensuring that Parties meet their BSC obligations (to provide accurate Metered data), and majority industry support, you:

- **AGREE** our suggested amendments to the redline text; and
- **APPROVE** CP1296 and CP1297 for implementation in the February 2010 Release.

2.3 CP1300 – System changes to support Change of Market Participant ID for the SVA Agent and MDD Agent Roles from 'CAPG' to 'SVAA'

2.3.1 ELEXON raised CP1300 on 05 June 2009. We issued CP1300 for Impact Assessment (via CPC00662) in June 2009.

2.3.2 CP1300 aims to ensure the role of the BSC Central Systems is more clearly defined in its interactions with the market. It does this by updating the Market Participant ID (MPID) for the Supplier Volume Allocation (SVA) Agent from 'CAPG' to 'SVAA'.

2.3.3 The current MPID could be said to be closely linked to the former Service Provider 'Capgemini'. The MPID is a designator intended to refer to the Supplier Volume Allocation Agent (SVAA), and it is better to have a designator which more clearly identifies the role and function of the relevant Service Provider. A change of designator will also assist in ensuring that persons do not still think that Capgemini is involved in the provision of the service.

2.3.4 We received 15 responses; of these 11 agreed, 2 disagreed and 2 were neutral. Those who agreed did not raise any additional arguments to those provided in the justification section of CP1300, while those who disagreed raised the concern this is a cosmetic change only with no business benefit justification at a large cost.

2.3.5 We recommend that, based on CP1300 more clearly reflecting the role of the BSC Central Systems within its interactions, and majority industry support, you:

- **APPROVE** CP1300.

2.3.6 If you choose to approve CP1300, we recommend that, due to the potential increase in cost and the risk to Settlement of implementing in June 2010 being greater than the risks of implementing in February 2010 (and the benefits being realised earlier), you:

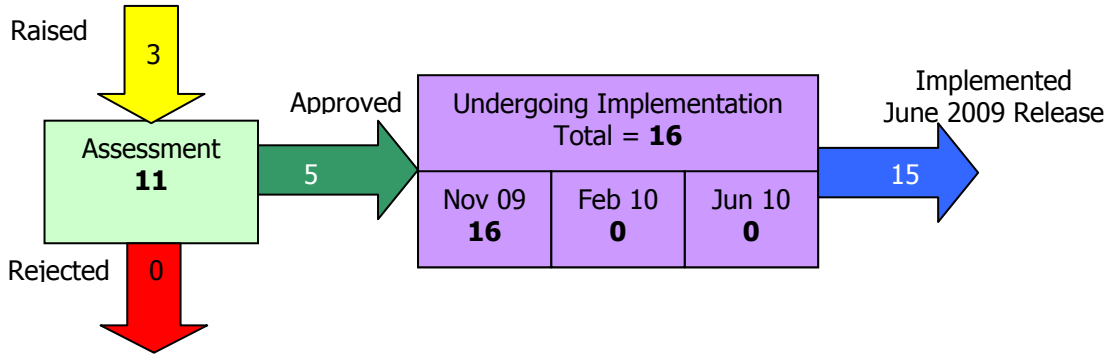
- **APPROVE** the February 2010 Release for the implementation of CP1300.

2.4 Implementation Costs

	BSC Agent (Demand Led)	ELEXON Operational		Total		Impacts
	Cost	Man Days	Cost	Cost	Tolerance	
CP1288	£0	1.25	£275	£275	10%	CoP4
CP1296	£0	2	£440	£440	10%	BSCP601, CoP5
CP1297	£0	2	£440	£440	10%	BSCP601, CoP10
CP1300	£44,242	37.5	£8,250	£52,492	10%	CVA, SVA, MDD, NHHDA, EAC/AA and PARMS software

3 Summary of Open Change Proposals

3.1 There are currently 27 open CPs, ISG own **4** CPs, ISG and SVG co-own **9** CPs, and SVG own the remaining 14 CPs. 3 new CPs have been raised since the last ISG meeting. Details of the new CPs are provided in Appendix 4 on page 47.



Please note:

- The numbers in the boxes indicate the number of CPs in a given phase.
- The numbers in arrows show the variance in the past month.

3.2 There are currently 5 open DCPs, 1 of which has been raised since the last ISG meeting. Details of the new DCP are provided in Appendix 4 on page 47.

4 Summary of Recommendations

4.1 The ISG is invited to:

a) **AGREE** the suggested amendment to the CP1288 redline text;

b) **APPROVE** CP1288 for inclusion in the November 2009 Release;

c) **AGREE** the suggested amendments to the CP1296 and CP1297 redline text;

d) **APPROVE** CP1296, CP1297 and CP1300 for inclusion in the February 2010 Release; and

e) **NOTE** the status of all open Draft Change Proposals and Change Proposals.

David Barber

ELEXON Change Delivery

List of appendices

Appendix 1 – Detailed Analysis of CP1288
Appendix 2 – Detailed Analysis of CP1296 and CP1297
Appendix 3 – Detailed Analysis of CP1300
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Appendix 5 – Release Information

List of attachments

Attachment A – CP1288 – CoP4 redlined
Attachment B – CP1296 – CoP5 redlined
Attachment C – CP1296 – BSCP601 redlined
Attachment D – CP1297 – CoP10 redlined
Attachment E – CP1297 – BSCP601 redlined

Appendix 1 – Detailed Analysis of CP1288 – Revisions to Meter test points within Code of Practice 4

1 Why Change?

1.1 **Background**

1.2 Npower raised CP1288 on 21 April 2009. We issued CP1288 for impact assessment (via CPC00661) in May 2009.

1.3 **The Problem**

1.4 Code of Practice 4 (CoP4) deals with the testing commissioning and the calibration of Metering Equipment. It specifically references the tests that are to be conducted on Meters before they are installed, and during their in-service lives. CP1288 aims to align the testing requirements within CoP4 with the British Standards, and to remove ambiguity for testing 3 phase Meters.

1.5 The test points in CoP4 were intended to align with those in British Standards, BS2 EN 62053-22:2003 and BS EN 62053-23:2003. However, CoP4 uses units of power factor (cos φ) for both Active and Reactive Meters whereas the British Standards use units of power factor for Active Meters and units of sin φ for Reactive Meters. This is causing some confusion to Meter Operator Agents and Meter manufacturers. The British Standards also allow a greater error range when a single phase of a polyphase Meter (a meter which is capable of more than one voltage supply to a premises) is tested.

2 Solution

2.1 CP1288 aims to align the testing provisions in CoP4 with the British Standards and to remove the ambiguity for testing 3 phase Meters. It will do so by:

Amending the headings for Reactive Meters in several tables to units of sin φ rather than power factor (cos φ) in Appendix B.

2.1.1 In Appendix B of CoP4, the headings for the Reactive Meters in tables B1, B2, B3, B4, B5 and C3 should be changed to units of sin φ rather than power factor to align with BS EN 62053-23 as shown below:

Reactive Meter		
Sin φ		
1	0.5 Inductive	0.5 Capacitive

[2] British Standards: http://www.standardsuk.com/

Inserting of a new diagram (Figure 1) into Appendix B to clarify the test point requirements for CoP 1 and 2 Reactive Meters

Figure 1

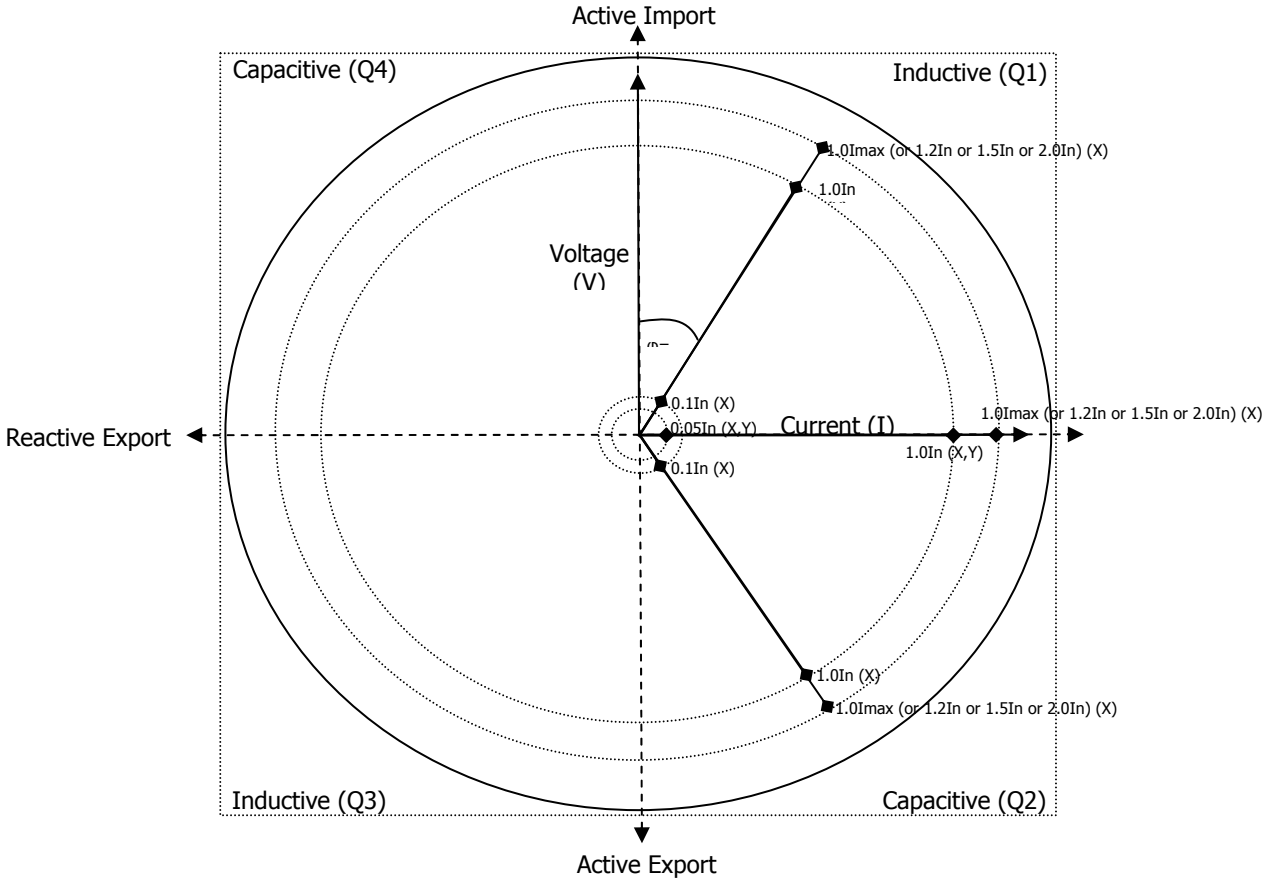

Figure 1: Example showing Type A Calibration Points for a CoP1 and 2 Reactive Energy Meter

Key
X = conduct tests on all elements combined
X,Y = conduct tests on all elements and each element on its own

Inserting new tables from British Standards BS EN 62053-22 and BS EN 6253-23 into Appendix C of CoP4

2.1.2 These tables will state the percentage error limits for polyphase Active and Reactive Meters. The standards allow a greater error when a single element of a polyphase Meter is being tested (i.e. carrying a single-phase load but with balanced polyphase voltages applied to the voltage circuits):

Active Meters

Value of current	Power Factor	Percentage error limits for Meters of class	
		0.2s	0.5s
$0.05I_n \leq I \leq I_{max}$	1	±0.3	±0.6
$0.1I_n \leq I \leq I_{max}$	0.5 inductive	±0.4	±1.0

The difference between the percentage error when the Meter is carrying a single-phase load and a balanced polyphase load at rated current, In, and unity power factor shall not exceed 0.4% and 1.0% for Meters of classes 0.2s and 0.5s respectively.

Reactive Meters

Value of current		Sin φ (inductive or capacitive)	Percentage error limits for Meters of class 2 and 3
Direct connected Meters	Transformer operated Meters		
$0.1I_n \leq I \leq I_{max}$	$0.05I_n \leq I \leq I_{max}$	1	±3.0
$0.2I_n \leq I \leq I_{max}$	$0.1I_n \leq I \leq I_{max}$	0.5	±4.0

The difference between the percentage error when the Meter is carrying a single-phase load and a balanced polyphase load at basic current, In, and sin φ =1 for direct connected Meters, respectively at rated current, In, and sin φ =1 for transformer operated Meters, shall not exceed 2.5% and 3.5% for Meters of classes 2 and 3 respectively.

2.2 Please see the redlining in Attachment A, which shows the exact changes that Npower are suggesting to CoP4.

3 Intended Benefits

3.1 The inconsistencies between the British Standards and CoP4 may cause Meter Operator Agents and Meter manufacturers to inadvertently use incorrect test points for calibration checks. Not allowing for a greater margin of error when testing a single element of a polyphase Meter may cause Meters to be sent for adjustment or scrapped unnecessarily.

4 Industry Views

4.1 We issued CP1288 for impact assessment in May 2009 (via CPC00661). We received 10 impact assessment responses; of these 7 agreed and 3 were neutral.

4.2 Some parties (one BSC Party and one non BSC Party) have raised concerns on the difficulty in finding testing laboratories which could carry out single element testing[3] for particular meters. This is outside the scope of CP1288, as the CP simply aims to clarify the metering test requirements within CoP4 by aligning them with that in the British Standards. We have provided a list of appropriate testing laboratories to these respondents. Additionally, ELEXON has agreed with these respondents to investigate whether a general metering dispensation would be required.

4.3 Some respondents suggested minor changes to add further clarity to the proposed redlined text (see comments in table 2 and 3 below). We agree with these comments and recommend that the SVG agree that the redline text should be amended to include them.

4.4 Additionally, a respondent suggested that the vector diagram in the British Standard 'BS EN 62053-23' is used within CoP4. We recommend that the SVG agree that the vector diagram contained in Appendix C of BS EN 6253-23 should replace the vector diagram that was issued during the impact assessment of CP1288.

4.5 We note that some of the proposed redline text and the diagram are identical to that in the British Standard documentation. We contacted the British Standards Institution (BSI) to confirm whether they are comfortable with this.

4.6 Following discussions between ELEXON and the BSI, permission has been granted to reproduce extracts from BS EN 62053-22 and BS EN 6253-23 within CoP4. As a consequence, we need to include an acknowledgement within CoP4, highlighting that permission has been granted from the

[3] A measuring component that measures the flow of electricity through a meter.

British Standards. We recommend that SVG agree this addition to the redlining. Please see table 3 for the proposed amendment to the redline text.

5 Impacts and Costs

Market Participant	Cost/Impact	Implementation time needed
ELEXON (Implementation)	Approximately 1.25 Working Days, which is equivalent to £275.	November 09 Release suitable
BSC Parties and Party Agents	The majority of respondents indicated that they would not be impacted by this change. Those that were impacted, highlighted that they would need 30 Working Days to make updates to internal documents and processes.	30 Working Days, November 09 Release suitable

6 Implementation Approach

6.1 We recommend that CP1288 is included for implementation in November 2009. This is in line with the recommended date in the CP form. We note that this CPAR has been delayed by 1 month, due to our discussions with the BSI.

6.2 We are in the process of contacting all respondents to reconfirm that November 2009 implementation is still suitable. However, given that respondents have indicated that only 30 Working Days are needed to make the necessary changes. We believe that a November 2009 implementation is suitable.

7 Recommendation

7.1 We believe that aligning the provisions of CoP4 with that of the British Standards will make it easier for Meter manufacturers to understand the CoP4 test requirements. Therefore, we recommend, based on CP1288 aligning the provisions of CoP4 with that of the British Standards and majority industry support, that you:

- **AGREE** our suggested amendments to the redline text; and
- **APPROVE** CP1288 for implementation in the November 2009 Release.

Lead Analyst: Sherwin Cotta, tel. 0207 380 4361 or email Sherwin.cotta@elexon.co.uk

Table 1 – Industry Impact Assessment Summary for CP1288 - Revisions to Meter test points within Code of Practice 4

IA History CPC number	CPC00661	Impacts	CoP4

Organisation	Capacity in which Organisation operates in	Agree?	Days 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

Table 2: Impact Assessment Responses[4]

Organisation	Agree?	Comments	Impact?	ELEXON Response
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** Generator **Impact on Organisation**: Removal of CoP4 test requirements which cannot be met. Changes would apply immediately starting with the next set of planned calibrations.	Yes	We discussed these comments with the respondent and agreed that this concern falls outside the scope of CP1288, as CP1288 simply looks to align meter test point provisions in CoP4 with the British Standards. We agreed that the ELEXON metering team will investigate this matter further on behalf of the industry. Npower have confirmed that they do not

[4] Please note that we have only included responses in this table where the respondent provided additional information.

Organisation	Agree?	Comments	Impact?	ELEXON Response
		Would implementation in the proposed Release have an adverse 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.		wish to extend the scope of this CP to cover the issues raised by British Energy.

Organisation	Agree?	Comments	Impact?	ELEXON Response
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?** No – provided notice given is sufficient.	Yes	The respondent has indicated that they would require to be informed by mid August if CP1288 was to be implemented, in order to give them the required time to make necessary changes to their processes.
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	ELEXON agrees with this suggestion and recommends that the SVG agree that the CP1288 redlining is amended to include the text in blue.

Organisation	Agree?	Comments	Impact?	ELEXON Response
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 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?** 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.	**Yes**	ELEXON agrees and recommends that the vector diagram contained in the British Standards should be used in place of the proposed vector diagram issued for impact assessment with CP1288. This diagram can be found in Appendix C of BS EN 6253-23. ELEXON contacted the respondent to clarify that single phase load points are required for 3ph 3wire networks. Impact of implementing the solution is noted. The respondent noted that they would prefer to confirm the new meter test point requirements with ELEXON. 30 days as a minimum is required to change their internal systems.

Table 3: Comments on the redline text

No	Organisation	Document name	Location	Severity Code[5]	Comments	ELEXON Recommendation
1	Cewe Instrument AB	CoP4	App 1 table B1 vector diagram	H	Internationally recognised standard diagram to be used.	As detailed in our response to Cewe in the table above, ELEXON recommends that the vector diagram from BS EN 6253-23 is used in place of the diagram issued for impact assessment.
2	Cewe Instrument AB	CoP4	App 1 Table B1	M	Are single phase load points required for 3ph 3wire networks?	Please see our response to Cewe in the table above. We also confirmed with the respondent that no changes will be required to the redline text.
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)"	Comment noted. ELEXON recommend that the SVG agree that amendment is made, as it adds further clarity to the proposed redline text. Therefore all remaining references to 'System power factor' in tables B1 to B5 should be replaced with 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)"	Comment noted. ELEXON recommend that the SVG agree that this change is made. As a result the heading for table C3 would read as: 'Summary of Class accuracy requirements for Class 2 and Class 3 Meters (single-phase Meters and polyphase Meters with balanced loads)'
5	British Energy	CoP4	Table B1 (and B2 for	H	While there is no requirement for Type B meter calibrations to include a single	Comment noted. We agreed with the respondent that this concern falls outside the

[5] High, Medium or Low

			any Type CEP/CEQ meters installed on CoP 3, 5, 6 or 7 metering systems)		element-only test, Type A calibrations currently require such tests. In practice however, although Cewe's newer, intelligent meters can be (and 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.	scope of CP1288, as the CP looks at clarifying the meter test point provisions in CoP4 and the issue raised by the respondent is a technical issue with the current requirements. We agreed that the ELEXON metering team will investigate this matter further on behalf of the industry.
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	We agreed with the respondent that this concern falls outside the scope of CP1288, as the CP looks at clarifying the meter test point provisions in CoP4 and the issue raised by the respondent is a technical issue. We agreed that the ELEXON metering team will investigate this matter further on behalf of the industry.

					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."	Please see our response to Npower in the table above. We recommend that the SVG agree that this change is made.
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."	Please see our response to Npower in the table above. We recommend that the SVG agree that this change is made.
9	British Standards Institution	CoP4	-	-	The BSI have requested that we include the following text into CoP4: Permission to reproduce extracts from [Name	We recommend that text is included at the end of Appendix C of CoP 4. Each of the extracts will be referenced to the relevant British Standard from which it is obtained. We will

					of Standard] is granted by BSI. British Standards can be obtained in PDF or hard copy formats from the BSI online shop: www.bsigroup.com/Shop or by contacting BSI Customer Services for hardcopies only: Tel: +44 (0)20 8996 9001, Email: cservices@bsigroup.com. • This permission does not cover any other editions. • On no account shall the extracts used be distributed as part of any other work not permitted under this licence. • This permission relates to the extracts listed above. Where the standard is updated and/or if there is a requirement for further reproduction of extracts you will need to make a new application. PERMISSION TO USE THE EXTRACTS LISTED IS GRANTED ONLY ON THE ABOVE CONDITIONS	also include reference to the permission granted from the British Standards.

Appendix 2 – Detailed Analysis of CP1296 and CP1297

1 Why Change?

1.1 Background

1.2 We raised CP1296 (Mandatory Capability to Record Reactive Power Demand (kvar) Values in Code of Practice 5 (CoP5) Meters) and CP1297 (Mandatory Capability to Record Reactive Power Demand (kvar) Values in Code of Practice 10 (CoP10) Meters) on 05 June 2009.

1.3 As described in paper SVG97/04, a Working Group on absent and erroneous Reactive Power Data was established by the Supplier Volume Allocation Group (SVG). The Group investigated problems that arise when the metered data provided to LDSOs by Half Hourly Data Collectors does not include all of the Reactive Power data required by the LDSO (for purposes of DUoS charging and network management).

1.4 These Change Proposals form part of a package of six recommended to SVG by the Working Group. The four related Change Proposals are:

- CP 1298, 'Requirement on MOAs to Configure Meters to Record Half Hourly Reactive Power Data (for Half Hourly Settled CT-Metered Customers)' – This CP will be presented to the SVG at their next meeting, on 4 August.
- CP 1299, 'Requirement on Half Hourly Data Collectors to Collect and Report Reactive Power Data (where the Meter is configured to record it)' – This CP will be presented to the SVG at their next meeting, on 4 August.
- CP 1302, 'Requirement on Half Hourly Data Collectors to Validate Reactive Power Demand Values' – This CP is currently out for Impact Assessment and will be presented to the SVG at their meeting on 1 September.
- CP 1303, 'Requirement on Half Hourly Data Collectors to Estimate Reactive Power Demand Values' – This CP is currently out for Impact Assessment and will be presented to the SVG at their meeting on 1 September.

2 The Problem

2.1 When LDSOs do not receive Reactive Power data, they are forced to make their own estimates of the missing data, for the purpose of calculating kVA Demand and Reactive Power charges. This presents difficulties for Suppliers, who potentially find it hard to pass on customers' charges based on estimated data. The issue is made more difficult – particularly for customer groups with sites spread across the country – by the inconsistent approaches to estimation adopted by different LDSOs.

2.2 Missing Reactive Power data also creates issues for LDSOs, who require such data to understand the power flows on their networks, the capacity requirements of their customers, and the efficiency of customers' electrical usage.

2.3 The Working Group identified a number of potential root causes for missing and erroneous Reactive Power data. One of these is that some of the metering Codes of Practice (including CoP5 and CoP10) do not currently require a capability to record period values for Reactive Power.

3 Solution

3.1 In order to address the issues caused by absent and erroneous Reactive Power data, it is proposed to amend Code of Practice (CoP)5 (CP1296) and CoP10 (CP1297) to require that the Meter has the capability to record Demand (kvar) values for Reactive Import and Reactive Export[6].

3.2 This will ensure that CoP5 and CoP10 Meters installed for Half Hourly customers (or Non Half Hourly customers who may enter the elective Half Hourly market at some future point) can provide Reactive Power data when required to do so.

3.3 The Working Group acknowledged that the requirement for Reactive Power metering was more relevant to industrial and commercial customers than domestic customers. However, with the extension of CoP10 to 100kW[7], and the likelihood that domestic customers will end up with smart Meters under different governance, it is proposed that the benefits of changing CoP10 will outweigh the disbenefits.

3.4 BSCP601 'Metering Protocol Approval and Compliance Testing' will need to be updated in order to ensure that the 'Meter Protocol Approval' and 'Compliance Testing' procedures align with the CoP5 changes[8].

4 Intended Benefits

4.1 For those customers for whom the LDSO already requires Reactive Power data, this change will assist Suppliers in meeting their BSC and DCUSA obligations to provide LDSOs with relevant metered data.

4.2 For those customers for whom the LDSO does not currently require Reactive Power data, this change will 'future proof' the metering (should a change in the customer's circumstances or in LDSO requirements mean that Reactive Power data is required at some point in the future).

4.3 The Working Group suspected that, historically, the reason for CoP5 not mandating Reactive Power Demand values was that different LDSOs had different charging requirements; and that Reactive Power metering requirements therefore varied from geographical area to geographical area. However, as the industry moves towards a common charging methodology (and higher levels of distributed generation), the Group believed that Reactive Power metering will become a requirement in all geographical areas.

5 Industry Views

5.1 We issued CP1296 and CP1297 for impact assessment in July 2009 (via CPC00662).

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[6] The terms 'Reactive Import' and 'Reactive Export' are defined in Appendix B to CoP5. For a site without generation, Reactive Import corresponds to a lagging power factor, and Reactive Export to a leading power factor. For sites with generation as well as demand, the situation is more complex, with Reactive Import corresponding to either leading demand or lagging generation.

[7] Change Proposal CP1273 ('Changes to the scope of CoP10 to cover current transformer operated Meters') was approved by SVG and implemented as part of the June 2009 BSC Release.

[8] Note: The same section of BSCP601 is impacted by CP1297. If both CP's are approved there will be minor changes to combine the redlining.

5.2 Responses to CP1296

5.2.1 We received 15 responses in relation to CP1296; of these 13 agreed, 1 disagreed and 1 was neutral.

5.2.2 The respondents who agreed with the proposal believed that this change would ensure a more effective process of capturing and reporting Reactive Power data. In addition one respondent believed that CP1296 would improve the data quality and lead to more accurate DUoS charging.

5.2.3 The respondent who disagreed, believed that CoP5 Meters should not be required to record Reactive Export at a predominantly Import site, as this would be an ineffective requirement as there is generally no Reactive Export values to report.

5.2.4 We contacted the respondent and highlighted that the Working Group believed that such data will be of increasing importance in the future, as a result of moves towards a common charging methodology, and increasing pressure on LDSOs to manage losses on their networks for environmental reasons. For these reasons, the view of the Group was that CoP5 should be amended to include a requirement for all kVAr values. The respondent noted our response but still did not agree with this change.

5.2.5 The respondent who submitted a neutral response raised concerns relating to the storage capacity of existing CoP5 Meters. The respondent highlighted that if CoP5 Meters were required to have the 'capability to provide' Reactive Power values this may reduce their storage capacity. This could result in the storage capacity of CoP5 Meters dropping below the requirement of 20 days, leaving the Meter non compliant.

5.2.6 We contacted the respondent and highlighted that this could potentially occur, however it was only likely to have an impact on early CoP5 Meters that would probably be due for change anyway. The respondent agreed with our response but still wanted their comments to be noted.

5.2.7 In addition the respondent queried whether the complexity required in CoP5 Meters would increase the risk in managing the asset? The respondent believed that the proving tests and in service testing may lead to a greater chance of errors occurring.

5.2.8 We contacted the respondent and highlighted that proving and in service testing would not change, however, the complexity in managing the Meters would probably increase. We consider this acceptable due to the benefit of being able to provide valid and accurate Reactive Power data to LDSOs and in so doing fulfilling our BSC Obligations.

5.3 Responses to CP1297

5.3.1 We received 15 responses in relation to CP1297; of these 12 agreed and 3 disagreed.

5.3.2 The respondents who agreed with the proposal believed that this change would ensure a more effective process of capturing and reporting Reactive Power data. In addition, one respondent believed that this change would enhance their current practice of Reactive Power charging.

5.3.3 The respondents who disagreed believed that this change would place an additional requirement within CoP10 that would provide minimal benefit to LDSOs (as they were more interested in the higher volume end of the market). The respondents also believed that CoP10 was intended to be a 'lighter' version of CoP5 and that by including these requirements within CoP10 one would be creating more complex and expensive Metering requirements, which was not the intention of CoP10.

5.3.4 We contacted these respondents and highlighted that the Working Group believed that such data would be of increasing importance in the future, as a result of moves towards a common charging methodology, and increasing pressure on LDSOs to manage losses on their networks for environmental reasons. For these reasons, the view of the Group was that CoP10 should be amended to include a requirement for all kVAr values.

5.3.5 In addition, we highlighted that the Working Group had issued a consultation (Please see attachment B to SVG97/04 for consultation responses) relating to the above issue. The Working Group believed that on a balance of responses the requirement should be included within CoP10 as this would create a consistency within the market and provide LDSO with Reactive Power data that was necessary for accurate and consistent DuOS charging. The Working Group also believed that the additional costs and requirements would not be high within this area of the market. The respondent noted our response but still did not agree with this change.

6 Impacts and Costs

6.1 Indicative impacts and costs received from participants were similar for both CP1296 and CP1297. The impacts and costs below therefore relate to both CP1296 and CP1297.

Market Participant	Cost/Impact	Implementation time needed
Party Agents	Several MOAs and DCs highlighted that internal process changes would be needed for both CP1296 and CP1297.	Implementation timescales ranged from between 60 to 365WDs for both CPs. The majority of Party Agents believed that the February 2010 Release would be suitable. One respondent indicated that they would require 365WDs in order to implement the necessary changes.
ELEXON (Implementation)	The estimated ELEXON implementation cost is 2 man days for each CP, which equates to £880.	February 2010 Release suitable.

7 Implementation Approach

7.1 We recommend that CP1296 and CP1297 should be approved for the February 2010 Systems Release.

7.2 We noted that one respondent requested 365 Working Days in order to implement **CP1298**. We discussed this with the respondent and highlighted that the majority of respondents to CP1296 and CP1297 had indicated that a February implementation date was suitable.

7.3 The respondent believed that because the 6 Reactive Power CPs were linked they should be included in the same release, and that because they need a year to implement CP1298, all of the CPs should be delayed. We highlighted to the respondent that we did not believe that CP1298 should prevent the other Reactive Power CPs from being implemented as this would hamper the

progress relating to the provision of accurate and valid Reactive Power data. The respondent remained of their view.

8 Conclusion

8.1 The majority of responses were in favour of the proposed changes. The views expressed by those in favour believed that CP1296 and CP1297 would go a long way towards ensuring that Licensed Distribution System Operators (LDSOs) received the data required to operate their networks, and to calculate Distribution Use of System (DUoS) charges. In addition these changes will ensure that Suppliers fulfil their BSC Obligations by providing accurate Reactive Power data to LDSOs.

8.2 The respondents who disagreed with the proposed solutions have not changed their views. Their comments have been included within this report.

8.3 After considering the comments received we still believe that the solution proposed by CP1296 and CP1297 are the most effective solutions.

9 Recommendation

9.1 We recommend, based on the additional benefit of being able to provide accurate Reactive Power data to LDSOs, ensuring that Parties meet their BSC obligations (to provide accurate Metered data), and majority industry support, that you:

- **AGREE** our suggested amendments to the redline text (as described in tables 3 and 6); and
- **APPROVE** CP1296 and CP1297 for implementation in the February 2010 Release.

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Table 1 – Industry Impact Assessment Summary for CP1296 - Mandatory Capability to Record Reactive Power Demand (kvar) Values in Code of Practice 5 (CoP5) Meters

IA History CPC number	CPC00662	Impacts	CoP5; BSCP601

Organisation	Capacity in which Organisation operates in	Agree?	Days to Implement
The Electricity Network Company	Distributor	Yes	-
E.ON	Supplier	Yes	-
Electricity North West Limited	LDSO	Yes	-
TMA Data Management Ltd	NHHDC, NHHDA, HHDC, HHDA	Yes	0
EDF Energy	Supplier, NHH Agent and HH MOP	Yes	60
EDF Energy Networks (EPN,LPN,SPN) and EDF Energy (IDNO) Ltd	LDSO, SMRS, UMSO	Yes	-
IMServ	NHHDC / NHHDA	Yes	90
E.ON UK Energy Services Limited	NHHDC/DA	Yes	-
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	-
CE Electric UK	LDSO, UMSO	Yes	-
ScottishPower	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes	120
Stark Software International Ltd	HHDC/HHDA/NHHDC/NHHDA	Yes	0
British Energy	Supplier	Yes	-
Western Power Distribution	LDSO, HHMOA, UMSO, MA, SMRA	No	90
NPower Limited	Supplier, Supplier Agents	Neutral	365

Table 2: Impact Assessment Responses[9]

Organisation	Agree?	Comments	Impact?	ELEXON Response
Electricity North West Limited	Yes	**Comments**: This change will enhance our current practice of reactive power charging by ensuring that meters have the facility to record reactive power data.	-	-
TMA Data Management Ltd	Yes	**Impact:** As a HHDC, we are already capable for retrieving the reactive power data and transmit validated reactive data to the Supplier and Distributor if the metering is programmed to record it	No	-

[9] Please note that we have only included responses in this table where the respondent provided additional information.

Organisation	Agree?	Comments	Impact?	ELEXON Response
EDF Energy	Yes	**Impact on Organisation's Systems and/or Processes?** Yes **Capacity in which Organisation is impacted:** MOP **Impact on Organisation :** Field Processes **Implementation No. of Calendar Days** 60 **Would implementation in the proposed Release have an adverse impact?** No	Yes	-
EDF Energy Networks (EPN,LPN,SPN) EDF Energy (IDNO) Ltd	Yes	**Comments:** BSCP 601 should also refer to CoP 1,2, 3 & 5 for clarity not just CoP 5. **Impact on Organisation's Systems and/or Processes?** Yes **Capacity in which Organisation is impacted:** LDSO **Impact on Organisation:** Improved Data Quality and more accurate DUoS Billing	Yes	We contacted the respondent and confirmed that we agree with their comments. We do not believe that this is a material change and that this will align with the Code of Practice documents. The respondent was happy with our response. We recommend that the SVG agree that the redlining should be amended as highlighted in table 3 (point 4) below.
Imserv	Yes	**Capacity in which Organisation is impacted:** MOA **Impact on Organisation:** Process changes primarily. **How much Implementation Notification is required from receipt of approved redline text changes?** No. of Calendar Days 90 **Would implementation in the proposed Release have an adverse impact?** No	Yes	-
E.ON UK Energy Services Limited	Yes	**Capacity in which Organisation is impacted**: MOA **Impact on Organisation:** All meters currently utilised for this COPs have this capability.	Yes	-
ScottishPower	Yes	ScottishPower supports the move to capture reactive energy for the elective HH market. Under current arrangements there is no way to capture the amount of reactive energy being generated in the	Yes	The respondent highlighted that where we have actual Reactive Power data, we should use this rather than estimates.

Organisation	Agree?	Comments	Impact?	ELEXON Response
		elective HH sector. **Impact on Organisation's Systems and/or Processes?:** Yes **Capacity in which Organisation is impacted** : MOA, Supplier, HHDC, LDSO **Impact on Organisation**: Changes will be required for internal processes. However it is not envisaged that there would be system impact. **Would implementation in the proposed Release have an adverse impact?** No **Other Comments:** ScottishPower believe where actual reactive power information is available for both reactive excess and KVA that this should be used instead of estimates calculated from the power factors.		We contacted the respondent and informed them that this was the case and that this was captured within CP1303 which was issued for impact assessment as part of CPC00666.
Stark Software International Ltd	Yes	The COP5 wording always was and still remains unclear. 'Demand Period', 'Measured Quantities', 'Demand Values', 'Energy Measurements', 'shall be 'provided'' are ambiguous expressions and could easily be re-drafted to distinguish between HH data, demand registers and cumulative registers.	No	We contacted the respondent and highlighted that there were mechanisms in place to address ambiguous expressions or unclear wording. The respondent indicated that they did not have problems with the redlining proposed within CP1296 and that their concerns were with existing wording in the CoP, rather than the redlining proposed. We suggested that they communicate any issues relating to the current wording to us so that we could address their concerns via the appropriate mechanisms. The respondent agreed that they would follow the appropriate processes in order to address these concerns.
Western Power Distribution	No	Please note these comments apply to CP1296. CP1297 and CP1298 which are all related.	Yes	We contacted the respondent and highlighted that the Working Group believed that such data will be of increasing importance in the future, as a result of

Organisation	Agree?	Comments	Impact?	ELEXON Response
		We agree with the need for kVArh import but do not think is necessary to record kVArh export for the vast majority of sites else we are increasing the volume of data handled by parties by 50% for little benefit. Reading the CPs for COP5 and COP10 it says it is about the meters having the **capability** to record reactive interval data but the red-lined versions of the CoPs make it mandatory to be set up? The amendments to BSCP514 imply it is only mandated for CT supplies and the CP says the obligation does not apply to whole current but this is not reflected in the changes to COP5 and COP10. The new BSCP also says if the meter has the capability it must be programmed (albeit only for CT). We think the changes should say: COP5/COP10 meters should have the capability to record interval kVArh import and kVArh export data. When trading HH COP5/COP10 must be setup to record interval kVArh import data. As we need kVArh import to correctly bill any HH site the distinction between CT and Whole Current (and any assumption that whole current COP10 will not trade HH) is inappropriate. **Impact on Organisation's Systems and/or Processes?** Yes **Capacity in which Organisation is impacted**: HHMOA\LDSO **Impact on Organisation:** Procedural changes and update to LWIs.		moves towards a common charging methodology, and increasing pressure on LDSOs to manage losses on their networks for environmental reasons. For these reasons, the view of the Group was that CoP5 should be amended to include a requirement for all kVAr values. The respondent did not agree with the Working Groups rationale and asked that we include their comments. The respondent also raised concerns regarding the use of the phrase 'shall be provided' within sections 4.1.1 and 4.1.2 of CoP5 and CoP10. The respondent believed that this phrase should be replaced by 'shall be capable of providing'. We indicated to the respondent that this was out of the scope of this CP (as it related to current wording within the CoP, rather than the proposed redline text); however, we believed that the current wording was suitable. The respondent did not agree with our response and asked that we include their comments within the report. Comments concerning changes to BSCP514 relate to CP1298 and will be included within that assessment report.

Organisation	Agree?	Comments	Impact?	ELEXON Response
NPower Limited	Neutral	It would to be appropriate that if DNOs are to adopt a common methodology for Reactive Power charging that the capability to record half-hourly Reactive Power (kvar) values should be mandated in CoP5. However, in mandating this capability consideration needs to be given to the following: Will this render some types of CoP5 meters as non compliant? The storage of additional channels of half-hourly Reactive Power values will affect the number of days a meter can store. This may mean certain meters storage capacity drops below the existing CoP5 requirement of 20 days. Will mandating the additional complexity increase the risk in managing the asset? Proving tests and in service testing will need to be performed on these assets and with extra channels there will be a greater chance of errors occurring. **Implementation Comment**: As CP1296, CP1297, CP1298 & CP1299 were raised to address the issue of "Absent and erroneous Reactive Power data" we believe that if approved they should go through as a package of changes in the same Release. For CP1298 our MOA has stated that they will require a minimum of 365 days lead time from approval of the redline text to implement the necessary changes to their systems and processes. Therefore, 365 days should be recommended for all 4 CPs in order that they can be included in the same Release.	No	We contacted the respondent and highlighted that this could potentially occur, however it was only likely to have an impact on quite old CoP5 Meters that would probably be due for change anyway. The respondent agreed with our response but still wanted their comments to be noted. We contacted the respondent and highlighted that proving and in service testing would not change, however, the complexity in managing the Meters would probably increase. We explained that we feel that this increase in complexity is justified as Meters would be capable of providing Reactive Power data, which would contribute towards allowing Parties to fulfil their BSC Obligations of providing accurate Meter data to LDSOs. The respondent agreed with our response but still wanted their comments to be noted. We discussed the implementation approach with the respondent and highlighted that the majority of respondents to CP1298 had indicated that a February implementation date was suitable. The respondent believed that because the 6 Reactive Power CPs were linked they should be included in the same release. We highlighted to the respondent that we did not believe that CP1298 should prevent the other Reactive Power CPs from being implemented as this would hamper the progress relating to the provision of accurate and valid Reactive power data. The respondent remained of their view.

Table 3: Comments on the CP1296 redline text

No.	Organisation	Document name	Location	Severity Code[10]	Comments	ELEXON Recommendation
1	SSE	601	3.4.7		The changes incorrectly state kvarh, demand should read kVAr	We agree with these comments and recommend that the redline text is amended. The current version of the redlining states: 3.4.7 (a) 'kvarh value is provided for each Reactive Energy Measured Quantity (CoP5 only)' This should be amended to read: 3.4.7 (a) 'kvar value is provided for each Reactive Energy Measured Quantity (CoP5 only)' We do not believe that this is a material change to the redline text.
2	npower	BSCP601	3.4.7 (a)		Redline text contains the requirement ";and kvarh value is provided for each Reactive Energy Measured Quantity". We believe this should be kVar rather than "kvarh" and the requirement should read ";and **kVar** value is provided **for each Demand Period** for each Reactive Energy Measured Quantity".	Please see the recommendation in point 1 above.
3	npower	CoP 5	5.5.1 (ii)		We believe that the additions of CoP5 4.1.2 (iii) & (iv) impact on 5.5.1 (ii), "a storage capacity of 48 periods per day for a minimum of 20 days for all Demand Values as defined in clause 4.1.2. The stored values shall be integer multiples of	We agreed that a change to section 5.5.1 (ii) should be approved in order to ensure consistency between the proposed redline changes. We recommend that section 5.5.1 (ii) be amended to read as follows: "a storage capacity of 48 periods per day for a minimum of 20 days for all Demand Values as defined in clause 4.1.2. The stored values shall be integer

[10] High, Medium or Low

No.	Organisation	Document name	Location	Severity Code[10]	Comments	ELEXON Recommendation
					kW". Should the requirement "The stored values shall be integer multiples of kW" be removed, or changed to also include integer multiples of kVar?	multiples of kW and kvar"; We do not believe that this is a material change to the redlining.
4	EDF Energy Networks (EPN,LPN,SPN) EDF Energy (IDNO) Ltd	BSCP601	3.4.6 & 3.4.7		BSCP 601 should also refer to CoP 1,2, 3 & 5 for clarity not just CoP 5.	We agree with these comments. We do not believe that this is a material change, and note that this will align with the Code of Practice documents. The current version of the section 3.4.6 redlining states: (d) Import Reactive Energy is measured in kvarh (CoP5 only) (e) Export Reactive Energy is measured in kvarh (CoP5 only) We recommend that the SVG agree the following amendments to the section 3.4.6 redlining: (d) Import Reactive Energy is measured in kvarh (CoP1, 2, 3 and 5) (e) Export Reactive Energy is measured in kvarh (CoP1, 2, 3 and 5) Section 3.4.7 currently reads as: (a) Kvarh value is provided for each Reactive Energy Measured Quantity (CoP5 only) We recommend that SVG agree that this should be amended to read: (a) Kvarh value is provided for each Reactive Energy Measured Quantity (CoP1, 2, 3 and 5)

Table 4 – Industry Impact Assessment Summary for CP1297 - Mandatory Capability to Record Reactive Power Demand (kvar) Values in Code of Practice 10 (CoP10) Meters

IA History CPC number	CPC00662	Impacts	CoP10; BSCP601

Organisation	Capacity in which Organisation operates in	Agree?	Days to Implement
The Electricity Network Company	Distributor	Yes	-
E.ON	Supplier	Yes	-
Electricity North West Limited	LDSO	Yes	-
TMA Data Management Ltd	NHHDC, NHHDA, HHDC, HHDA	Yes	-
EDF Energy	Supplier, NHH Agent and HH MOP	Yes	60
EDF Energy Networks (EPN,LPN,SPN) and EDF Energy (IDNO) Ltd	LDSO, SMRS, UMSO	Yes	-
IMServ	NHHDC / NHHDA	Yes	90
E.ON UK Energy Services Limited	NHHDC/DA	Yes	-
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	-
CE Electric UK	LDSO, UMSO	Yes	-
ScottishPower	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes	120
British Energy	Supplier	Yes	-
Western Power Distribution	LDSO, HHMOA, UMSO, MA, SMRA	No	90
NPower Limited	Supplier, Supplier Agents	No	365
Stark Software International Ltd	HHDC/HHDA/NHHDC/NHHDA	No	-
Association of Meter Operators	Trade Association representing Meter Operators	Neutral	-

Table 5: Impact Assessment Responses[11]

Organisation	Agree?	Comments	Impact?	ELEXON Response
Electricity North West Limited	Yes	**Comments**: This change will enhance our current practice of reactive power charging by ensuring that meters have the facility to record reactive power data.	-	-

[11] Please note that we have only included responses in this table where the respondent provided additional information.

Organisation	Agree?	Comments	Impact?	ELEXON Response
TMA Data Management Ltd	Yes	**Impact:** As a HHDC, we are already capable for retrieving the reactive power data and transmit validated reactive data to the Supplier and Distributor if the metering is programmed to record it.	No	-
EDF Energy	Yes	**Capacity in which Organisation is impacted** MOP **Impact on Organisation :** Field processes **Implementation:** 60 Days **Would implementation in the proposed Release have an adverse impact?** No	Yes	-
EDF Energy Networks (EPN,LPN,SPN) and EDF Energy (IDNO) Ltd	Yes	**Comments:** BSCP 601 should also refer to CoP 1,2, 3,5 and 10 for clarity not just CoP 10 **Impact on Organisation's Systems and/or Processes?** No **Capacity in which Organisation is impacted:** LDSO **Impact on Organisation:** Improved Data Quality and more accurate DUoS Billing **Would implementation in the proposed Release have an adverse impact?** No	No	We contacted the respondent and confirmed that we agree with their comments. We do not believe that this is a material change and that this will align with the Code of Practice documents. Please see table 6 for details of how we believe this suggested change should be applied. The respondent was happy with our response.
Imserv	Yes	**Capacity in which Organisation is impacted:** MOA **Impact on Organisation :** Process Changes **Would implementation in the proposed Release have an adverse impact?** No	Yes	-
E.ON UK Energy Services Limited	Yes	**Capacity in which Organisation is impacted**: MOA **Impact on Organisation:** All meters currently utilised for this COPs have this capability.	Yes	-
Western Power Distribution	No	Please see response to CP1296.	Yes	Please see response to CP1296.

Organisation	Agree?	Comments	Impact?	ELEXON Response
ScottishPower	Yes	**Comments**: ScottishPower supports the move to capture reactive energy for the elective HH market. Under current arrangements there is no way to capture the amount of reactive energy being generated in the elective HH sector. **Impact on Organisation's Systems and/or Processes?** Yes **Capacity in which Organisation is impacted**: MOA, Supplier, HHDC, LDSO **Impact on Organisation**: Changes will be required for internal processes. However it is not envisaged that there would be system impact. **Would implementation in the proposed Release have an adverse impact?** No **Other Comments:** Consideration should be given to the fact that COP10 meters are designed to allow customers using them to move between NHH and HH without a meter change. As NHH sites will not be required to record reactive energy a site visit may be required to reconfigure such meters to record reactive energy where this cannot be done remotely. This may impact on other documents and as such Elexon should investigate whether any further changes may be required to ensure this is captured and implemented correctly.	Yes	We confirmed with the respondent that ELEXON performs an internal impact assessment of all changes in order to ascertain whether all potential impacts of this change have been addressed. In addition we highlighted to the respondent that if they became aware of any potential impacts that were not raised as part of the Change Proposal, to inform us as part of their response. The respondent indicated that they did not believe that their were any further impacts as part of this CP, however, they would inform us in future if any impacts were missed.
NPower Limited	No	**Comment**: We must recognise that there is a limit to the usefulness of half-hourly Reactive Power data and this limit is based on the load at site. The vast majority of sites where CoP10 compliant metering is installed will fall outside of the scope where this data is useful. It is highly likely that if this requirement is mandated the capability will only be 'switched on' at a small number of CoP 10 sites. CoP10 was intended to be 'lighter' version of CoP 5 to allow a cheap and simple method of recording half-hourly active data, particularly given consideration over the roll out of smart metering. Mandating these additional requirements will make CoP10 meters	No	We contacted this respondent and highlighted that the Working Group believed that such data would be of increasing importance in the future, as a result of moves towards a common charging methodology, and increasing pressure on LDSOs to manage losses on their networks for environmental reasons. For these reasons, the view of the Group was that CoP10 should be amended to include a requirement for all kVAr values.

Organisation	Agree?	Comments	Impact?	ELEXON Response
		more complex and expensive. Aligning it closer to CoP 5 raises questions over the original requirement for CoP 10. We do not believe there is a case for imposing additional costs and requirements on this area of the market. **Implementation Comments**: As CP1296, CP1297, CP1298 & CP1299 were raised to address the issue of "Absent and erroneous Reactive Power data" we believe that if approved they should go through as a package of changes in the same Release. For CP1298 our MOA has stated that they will require a minimum of 365 days lead time from approval of the redline text to implement the necessary changes to their systems and processes. Therefore, 365 days should be recommended for all 4 CPs in order that they can be included in the same Release.		In addition, we highlighted that the Working Group had issued a consultation (Please see attachment B to SVG97/04 for consultation responses) relating to the above issue. The Working Group believed that on a balance of responses the requirement should be included within CoP10. This would create a consistency within the market and provide LDSOs with Reactive Power data that would be necessary for accurate and consistent DuOS charging. The Working Group also believed that the additional costs and requirements would not be high within this area of the market. The respondent did not agree with the Working Groups rationale and asked that we include their comments.
Stark Software International Ltd	No	The benefit of COP10 was to provide low cost HH data at sub 100kW metering points. This upgrade appears to mandate a very similar spec to COP5. Again there is ambiguity over the description of terms. See comments on CP1296. **Capacity in which Organisation is impacted:** HHDC/NHHDC	No	We contacted the respondent and highlighted that the Working Group believed that such data would be of increasing importance in the future, as a result of moves towards a common charging methodology, and increasing pressure on LDSOs to manage losses on their networks for environmental reasons. For these reasons, the view of the Group was that CoP10 should be amended to include a requirement for all kVAr values. In addition, we highlighted that the Working Group had issued a consultation (Please see attachment B to SVG97/04 for consultation responses) relating to the above issue. The Working Group believed that on a balance of responses the requirement should be

Organisation	Agree?	Comments	Impact?	ELEXON Response
				included within CoP10 as this would create a consistency within the market and provide LDSO with Reactive Power data that was necessary for accurate and consistent DuOS charging. The Working Group also believe that the additional costs and requirements would not be high within this area of the market. The respondent did not agree with the Working Groups rationale and asked that we include their comments.
Association of Meter Operators	Neutral	The ENA is managing a process to develop a common DUoS charging methodology. The process is ongoing and will result in changes being implemented in Apr 2010. The current proposals – available on ENA website – rely on 'supercustomer' DUoS billing for NHH customers, which does not rely on reactive data. This will not be a change for most Distributors, but there is at least one who is currently attempting reactive NHH billing. If the current proposals are adopted then reactive billing for NHH customers cease for all Distributors in April 2010. It would seem appropriate to review this CP as a result of the ENA members work. The probably outcome would be the need for reactive measurement for CT metered sites, but not for whole current. It would be unfortunate to initiate a change under the BSC for CoP10 which will add complexity and therefore cost to the metering requirements where there is no need – particularly when the requirement is not a 'settlement' requirement.		We contacted the respondent and highlighted that the Working Group believed that such data would be of increasing importance in the future, as a result of moves towards a common charging methodology, and increasing pressure on LDSOs to manage losses on their networks for environmental reasons. For these reasons, the view of the Group was that CoP10 should be amended to include a requirement for all kVAr values. In addition, we highlighted that the Working Group had issued a consultation (Please see attachment B to SVG97/04 for consultation responses) relating to the above issue. The Working Group believed that on a balance of responses the requirement should be included within CoP10 as this would create a consistency within the market and provide LDSOs with Reactive Power data that would be necessary for accurate and consistent DuOS charging. The Working Group also believe that the additional costs and requirements would not be high within this area of the market.

Organisation	Agree?	Comments	Impact?	ELEXON Response
				In addition, we confirmed with the respondent that we believed that the 6 Reactive Power CPs, which we issued to Industry, were consistent with the ENA members work i.e. they focus primarily on CT and HH metered sites, which is they key focus areas of LDSOs. We highlighted that CP1297 did not relate to CT nor Whole Current Metered sites and that this would be addressed as part of the CP1298 assessment report.

Table 6: Comments on the CP1297 redline text

No.	Organisation	Document name	Location	Severity Code[12]	Comments	ELEXON Recommendation
1	SSE	601	3.4.7		As per CP1296, the changes incorrectly state kvarh, demand should read kVAr	Please see comments within table 3 above.
2	npower	BSCP601	3.4.7 (a)		Redline text contains the requirement ";and kvarh value is provided for each Reactive Energy Measured Quantity". We believe this should be kVar rather than "kvarh" and the requirement should read ";and kVar value is provided for each Demand Period for each Reactive Energy Measured Quantity".	Please see comments within table 3 above.
3	EDF Energy Networks (EPN,LPN,SPN) and	BSCP601	3.4.6 & 3.4.7		BSCP 601 should also refer to CoP 1,2, 3, 5 and 10 for clarity not just CoP 10.	We agree with these comments. We do not believe that this is a material change and that this will align with the Code of Practice documents. We recommend that this change is approved.

[12] High, Medium or Low

No.	Organisation	Document name	Location	Severity Code[12]	Comments	ELEXON Recommendation
	EDF Energy (IDNO) Ltd					The current version of the section 3.4.6 redlining states: (d) Import Reactive Energy is measured in kvarh (CoP10 only) (e) Export Reactive Energy is measured in kvarh (CoP10 only) We recommend that the SVG agree the following amendments to the section 3.4.6 redlining: (d) Import Reactive Energy is measured in kvarh (CoP1, 2, 3 and 10) (e) Export Reactive Energy is measured in kvarh (CoP1, 2, 3 and 10) Section 3.4.7 currently reads: (a) Kvarh value is provided for each Reactive Energy Measured Quantity (CoP10 only) We recommend that SVG agree that this should be amended to read: (a) Kvarh value is provided for each Reactive Energy Measured Quantity (CoP1, 2, 3 and 10)

Appendix 3 – Detailed Analysis of CP1300 – System changes to support Change of Market Participant ID for the SVA Agent and MDD Agent Roles from 'CAPG' to 'SVAA

1 Why Change?

1.1 **Background**

1.2 ELEXON raised CP1300 on 05 June 2009 as requested by Capgemini. This was a result of Logica taking over the BSC Services Contract as Business Process Operator (BPO) / Host of the Central Systems.

1.3 **The Problem**

1.4 Capgemini feel the MPID currently in use by the SVA Agent ("CAPG") is linked closer to them as a company, rather than the role. They would not like any potential errors / issues with the BSC Central Systems to reflect badly on them.

2 Solution

2.1 A number of system / application updates are required:

System	Solution
Market Domain Data (MDD)	A new MPID "SVAA" is to be created with Market Role Codes "G" and "U", the Effective From Date is to be the Market Domain Data (MDD) Go Live Date. An Effective To Date of the day before the above MDD Go Live Date is to be applied to the "CAPG" MPID and its Market Role Codes "G" and "U".
Affected Data Transfer Network (DTN) Output Flows	The MPID is contained in: • All the MDD flows sent from the SVA Agent in the From Participant ID field of the ZHD header row; • The Market Participant (MAP) and Market Participant Role (MPR) record set in the D0269 'Market Domain Data Complete Set' and D0270 'Market Domain Data Incremental Set' flows; and • The ISR (Initial Settlement & Reconciliation) Agent Appointments (IAA) table in the D0269 and D0270 flows.
Affected DTN Input Flows	The MPID is contained in all the MDD flows sent to the SVA Agent in the To Participant ID field of the ZHD header row. The Service Provider is to develop a script to resolve a potential cut-over issue with the D0265 'Line Loss Factor Data File'.
Central Registration Agent (CRA)	An extra code is to be added to the P0181 'BM Unit Registration Data File' report – a workaround to retrieve the correct identifier.
SVA Agent (ISRA)	Changes to standing data, including the System Participant ID and the active ISR and MDD Agent. The Service Provider is to provide manual scripts. All SVA Agent Operational Scripts which refer to "CAPG" will need updating. System documentation will need to be updated.
Non Half-Hourly Data Aggregator (NHHDA)	Changes to the Standing Data are required. Participants can either load MDD with the new definitions or the updates can be performed manually using the

System	Solution
and Estimated Annual Consumption / Annualised Advance (EAC/AA) Software	front end. A new "SVAA" MPID will need to be defined in the EAC/AA database, for which a manual update (SQL script) is to be issued to Participants by the Service Provider.
Performance Assurance Reporting and Monitoring System (PARMS)	A number of filetype definitions and database tables will need an update from "CAPG" to "SVAA". System documentation will need to be updated.

3 Intended Benefits

3.1 CP1300 would allow a more generic MPID to be used by the role of the SVA Agent. There is potential for the Service Provider to change again in the future and the use of 'SVAA' is a clearer representation of the role and better future proofed against further changes in due course.

4 Industry Views

4.1 CP1300 was issued for impact assessment in June 2010 via CPC00662. We received 15 responses; of these 11 agreed, 2 disagreed and 2 were neutral.

4.2 None of the 11 respondents who agreed with the change provided comments.

4.3 The two respondents who disagreed with CP1300 both highlighted that they felt there is no business benefit; just a large cost and risk to Settlement. They also raised the point that there are a number of Parties whose MPIDs do not resemble the current business ownership, through a number of mergers and acquisitions which have occurred within the market.

4.4 A respondent who was neutral commented they were "happy to change but don't really see the need".

5 Impacts and Costs

Market Participant	Cost/Impact	Implementation time needed
BSC Agent (Application Management and Development; Business Process Operator)	Development costs for CVA, SVA and Minor Applications cost: £9,990 Testing and documentation costs for CVA, SVA and Minor Applications £27,599 Software development and testing for PARMS £6,653 **Total BSC Agent cost £44,242**[13]	February 2010 Release suitable

[13] These costs are the correct costs and slightly higher than the ones provided in the Change Proposal form. This is due to the final cost of the PARMS development now being formalised.

Data Transfer Network	There is no charge for the DTN to accept both MPIDs until the market has changed over (note this is separate from the BSC Systems accepting the "CAPG" MPID after go-live).	February 2010 Release suitable
ELEXON (Implementation)	ELEXON will be supervising the changes for the 3 development contracts, deploying the PARMS upgrade, providing witness to the software testing, and co-ordinating the industry participant testing. **Total ELEXON Cost £8,250** * Note industry participation will be required for industry participant testing.	February 2010 Release suitable
Market participants	All Market Participants who receive automated flows from and send automated flows to the SVA Agent are impacted. 9 of the 15 respondents indicated they would need time to implement the system changes: • 2 x 1 month • 4 x 3 months • 2 x 6 months • 1 x 9 months Implementation in the February 2010 Release would mean a 6-7 month timescale.	February 2010 Release suitable

6 Implementation Approach

6.1 ELEXON recommends CP1300 is implemented in the February 2010 Release, as this is the next available release, and can be met by all but one respondent. Please note that the go-live date is to be an MDD go-live date close to this time, not the February Release go-live date.

6.2 One Party has stated they will not be able to meet the timescales. After further consultation, they have stated the earliest possible Release for them to meet is the June 2010 Release. This is due to the large MDD change (CP1269 'Publication of Additional Non Half Hourly Combination Data in Market Domain Data') which is due to go live as part of the November 2009 Release. The respondent stated it is too difficult for large scale MDD changes to be implemented in consecutive Releases.

6.3 Table: Advantages of the different implementation options:

Advantages of February 2010 Implementation	Advantages of June 2010 Implementation
Change will be completed by current Service Provider, under the existing contract. The BSC Agent costs provided above are indicative only if CP1300 is not implemented in February 2010, and could change; this is due to the possibility of a new Service Provider completing development work for June 2010 or a new contract being in place for the June Release. Risk of implementation slightly increased for June	Increased time between MDD changes All market participants capable of completing the change in these timescales. Risk of implementation increased for February as one market participant has indicated that they cannot meet this date.

Advantages of February 2010 Implementation	Advantages of June 2010 Implementation
due to the potential for a new Service Provider / Service Provider handover in April 2009.	

6.4 As an implementation option, if CP1300 is approved, the industry could speak to the Data Transfer System (DTS) User Group and explore a fix where the DTN automatically converts the files. This could work out to be more cost effective for participants than individual system adjustments

6.5 The DTN will accept both MPIDs after go-live for as long as is needed for participants to change their own systems. However, this does not mean files will be accepted by the BSC Systems.

7 Conclusions

Approving / Rejecting CP1300

7.1 The majority of the industry agreed with the change as they either

- agreed with the justification within CP1300; or
- they could not find anything wrong with the request, as opposed to believing it is necessary.

7.2 Capgemini has not raised any convincing legal reason to change the MPID, and it is also correct to say that many BSC Parties use MPIDs which are not entirely reflective of their current business ownership.

7.3 However, it is noted that Capgemini has a concern that the MPID is associated with it and therefore that if an error / issue were to arise stemming from the new Service Provider, this might reflect badly on them even though it no longer provides the service.

7.4 The solution would ensure this issue does not arise again.

7.5 The Release which best fits the implementation should be treated as a separate issue to the approval of CP1300.

Implementing CP1300

7.6 There are risks for implementing in February 2010 (not all participants are able to make this date) and June 2010 (current costs are indicative only, and could increase).

7.7 There are options for the industry with regard to the DTN and the Service Provider to make the cut-over easier on market participants who could not meet the timescales, but these would come at a cost.

7.8 The risks for June 2010 could be countered by applying for the development work to be completed during the current financial year. Many of the BPO activities however will need to be completed on or around the implementation date.

8 Recommendation

8.1 We recommend, based on CP1300 more clearly reflecting the role of the BSC Central Systems within its interactions, and majority industry support that you:

- **APPROVE** CP1300.

8.2 We recommend (provided the decision in 8.1 is to approve the CP), that due to the potential increase in implementation costs and the risk to Settlement of implementing in June 2010 being greater than the risks of implementing in February 2010, that you:

- **APPROVE** the February 2010 Release for the implementation of CP1300.

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Table 1 – Industry Impact Assessment Summary for CP1300 - System changes to support Change of Market Participant ID for the SVA Agent and MDD Agent Roles from 'CAPG' to 'SVAA

IA History CPC number	CPC00662	Impacts	CVA, SVA, MDD, NHHDA, EAC/AA and PARMS software

Organisation	Capacity in which Organisation operates in	Agree?	Days to Implement
The Electricity Network Company	Distributor	Yes	-
E.ON	Supplier	Yes	180
Electricity North West Limited	LDSO	Yes	-
TMA Data Management Ltd	NHHDC, NHHDA, HHDC, HHDA	Yes	90
EDF Energy	Supplier, NHH Agent and HH MOP	Yes	0
EDF Energy Networks (EPN,LPN,SPN) EDF Energy (IDNO) Ltd	LDSO, SMRS, UMSO	Yes	180
IMServ	NHHDC / NHHDA	Yes	90
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	30
Siemens Metering Services	NHHDC, NHHDA, NHHMO, HHDC, HHDA, HHMO	Yes	90
G4S AccuRead	NHHDC, NNHDA, MOP	Yes	91
British Energy	Supplier	Yes	-
E.ON UK Energy Services Limited	NHHDC/DA	No	-
NPower Limited	Supplier, Supplier Agents	No	9 months
CE Electric UK	LDSO, UMSO	Neutral	-
Stark Software International Ltd	HHDC/HHDA/NHHDC/NHHDA	Neutral	30

Table 2: Impact Assessment Responses[14]

Organisation	Agree?	Comments	Impacted?	ELEXON Response
The Electricity Network Company	Yes	**Impact:** Distributor	Yes	-

[14] Please note that we have only included responses in this table where the respondent provided additional information.

Organisation	Agree?	Comments	Impacted?	ELEXON Response
E.ON	Yes	**Impact on Organisation's Systems and/or Processes?** Yes **Capacity in which Organisation is impacted**? Supplier **Impact on Organisation:** System / processes	Yes	-
Electricity North West Limited	Yes	**Comments:** There will be a small impact via a system change and subsequent testing to ensure we can process the amended flow. **Impact on Organisation's Systems and/or Processes?** Yes **Capacity in which Organisation is impacted?** LDSO **Impact on Organisation?** Small impact on systems and processes.	Yes	-
TMA Data Management Ltd	Yes	**Capacity in which Organisation is impacted:** NHHDC, NHHDA, HHDC, HHDA **Impact on Organisation:** Systems **Implementation :** No. of Calendar Days 90 **Costs:** The estimated cost for all 4 agencies is estimated to be £14 K	Yes	-
EDF Energy	Yes	**Comments:** We do not see that changing this id will have any impact as it will be dealt with under process for MDD updates	No	-
EDF Energy Networks (EPN,LPN,SPN) EDF Energy (IDNO) Ltd	Yes	**Capacity in which Organisation is impacted** LDSO **Impact on Organisation?** System and Process changes **How much Implementation Notification is required from receipt of approved redline text**	Yes	-

Organisation	Agree?	Comments	Impacted?	ELEXON Response
		changes? **No. of Calendar Days** 180 **Would implementation in the proposed Release have an adverse impact?** No		
Imserv	Yes	**Capacity in which Organisation is impacted:** HHDA, NHHDA **Impact on Organisation:** Some configuration changes required **Would implementation in the proposed Release have an adverse impact?** No	Yes	-
Scottish and Southern Energy	Yes	**Impact on Organisation's Systems and/or Processes?** Yes **Impact on Organisation** Systems and processes **Implementation** Days 30 - Allow for testing and making the changes	Yes	-
Siemens Metering Services	Yes	**Agree Change?** Yes **Impact on Organisation's Systems and/or Processes?** Yes – 90 days required **Capacity in which Organisation is impacted:** NHHDC, NHHDA, NHHMO, HHDC, HHDA, HHMO **Impact on Organisation :** System changes required **Would implementation in the proposed Release have an adverse impact?** No adverse impact	Yes	-
ScottishPower Energy Management Ltd.	Yes	**Comments** Scottish Power believes that the proposed scripts to add in the new market participant could be managed by STAG as per the process identified in CP1295.	Yes	-

Organisation	Agree?	Comments	Impacted?	ELEXON Response
		Capacity in which Organisation is impacted: HHDA, NHHDA, EAC/AA, HHDC, NHHDC, PARMS & Supplier Systems. **Impact on Organisation:** Systems would have to be re-configured to accept new market participant ID **Comments** Proposed changes to HH systems will require a minimum 6 months lead time and will therefore have an impact on the proposed release date of February 2010. **Costs:** Scottish Power feel that the proposed costs are almost prohibitively expensive for what is effectively a cosmetic change**.**		
G4S AccuRead	Yes	**Capacity in which Organisation is impacted:** NHHDA / NHHDC (Ref: EAC/AA) **Impact on Organisation :** Systems	Yes	-
E.ON UK Energy Services Limited	No	**Comments** We believe that the change of MPID is merely a cosmetic change and as such is hard to justify the associated costs to the community as a whole. In addition there are a large number of market participants currently operating with legacy MPIDs that do not reflect the current ownership of the agency service. If there where to be a wholesale change to MPIDs throughout the community triggered by this change. In addition to the significant costs associated with these changes there would be a increased risk that flows would be misdirected with the consequent impact on settlements. **Impact on Organisation's Systems and/or Processes?** Yes **Capacity in which Organisation is impacted:** NHHDC and NHHDA	Yes	We discussed these comments with the respondent and explained that ELEXON understands the arguments presented but will be recommending the CP is approved in line with the majority of industry respondents. Despite many companies using MPIDs which are not directly reflective of the current business ownership, the previous Central Services provider is not a BSC Party (who is bound by the BSC) but is a contractor providing services. In this regard ELEXON has noted that Capgemini is concerned that, as the current MPID is associated with it, any errors/issues could reflect badly on Capgemini despite it not holding the contract. The respondent accepted the recommendation of ELEXON, describing it as

Organisation	Agree?	Comments	Impacted?	ELEXON Response
		Impact on Organisation: Negligible **Would implementation in the proposed Release have an adverse impact?** No **Other Comments:** MDD should be updated with this change which will load automatically, therefore causing no impact. A cosmetic change seems feasible for potential future changes to the service provider – add the change of name into the testing of the new service provider?		'understandable'.
NPower Limited	No	**Comments:** There is no Business Justification for this change. Since the market opened in 1998 there has been many merges and acquisitions within the market resulting in MPIDs changing ownership. In some cases the same MPID is being used by different organisations, performing different roles, with different role codes. Therefore there are already many instances where the 4 Character MPID bares no resemblance to the name of the organisation that either owns or operates the MPID and this has not caused any issues within the market. The change of Service Provider from CAPG to SVAA is no different from previous changes within the market. MDD has already been updated to reflect the change of ownership and we believe this is sufficient. Making these additional changes will add significant costs to our Business for no benefit. **Impact on Organisation's Systems and/or Processes?** Yes **Capacity in which Organisation is impacted** Supplier, HHDC, HHDA, NHHDA **Impact on Organisation:** Settlement Systems, Agent Systems and Supplier Systems will all be impacted by	Yes	We discussed these comments with the respondent and explained that ELEXON understands the arguments presented but will be recommending the CP is approved in line with the majority of industry respondents. Despite many companies using MPIDs which are not directly reflective of the current business ownership, the previous Central Services provider is not a BSC Party (who is bound by the Code) but is a contractor providing services. In this regard ELEXON has noted that Capgemini is concerned that, as the current MPID is associated with it, any errors/issues could reflect badly on Capgemini despite it not holding the contract. The respondent replied they still disagree with the change as there is no business justification. Also asked the respondent if they could meet the February 2010 Release for implementation if this CP is to be approved as of the 4 August SVG meeting. The respondent commented they could not

Organisation	Agree?	Comments	Impacted?	ELEXON Response
		this change. **Would implementation in the proposed Release have an adverse impact?** Yes **Costs:** We would incur system development costs on multiple systems and have to undertake testing on all of these which would incur cost for no apparent benefit. The process as its currently operating is not causing any issues and we don't see why it should be changed.		meet this deadline. There is a large MDD change occurring in the November 2009 Release (CP1269 'Publication of Additional Non Half Hourly Combination Data in Market Domain Data') and the respondent stated it is too difficult for the changes to go into consecutive Releases. The earliest possible Release to implement is the June 2010 Release.
Stark Software International Ltd	Neutral	**Comments:** Happy to change, but do not really see the need. If the risks and costs are as high as indicated, consideration should be given to leaving well alone. **Impact on Organisation's Systems and/or Processes?** Yes **Capacity in which Organisation is impacted:** HHDA/NHHDA/HHDC/NHHDC **Impact on Organisation:** Minor system change	Yes	-

Table 3: Comments on the redline text

No redline text was required for this CP.

Appendix 4 – New Draft Change Proposals and Change Proposals

New Draft Change Proposals and Change Proposals

DCP	CVA/SVA	Title	Description	Raised
0045	CVA and SVA	Maintenance of Outstation Type Information	At present, altering the Valid Set of 'Outstation Type' requires a formal change to the DTC. This can give rise to issues when new equipment is introduced outside the DTC release timescales. The result is that the Valid Set will often be out of date, and participants have to resort to manual workarounds in order to transfer the necessary information. DCP0045 sets out 6 options, concerning how the Valid set of Outstation Type could be maintained in a more transparent and efficient way.	03/07/09

New Change Proposals

CP	CVA/SVA	Title	Description	Raised
1301	CVA	Registration Requirements for System Connection Points Between Onshore Distribution Systems and Offshore Transmission Systems	For some time now, BERR and Ofgem have been developing a new regulatory regime for Offshore licensed Transmission Systems. In June 2009 the Secretary of State approved changes to the Balancing and Settlement Code. The approved changes are now in the relevant sections of the BSC. CP1301 recommends that these changes are reflected in the relevant Code Subsidiary Documents.	03/07/09
1302	SVA	Requirement on Half Hourly Data Collectors to Validate Reactive Power Demand Values	The reporting of erroneous Reactive Power data to LDSOs and Suppliers potentially leads to incorrect DUoS charges and other issues. CP1302 recommends extending the scope of existing validation processes to include Reactive Power data. This would reduce errors in those industry processes that use Reactive Power data (e.g. DUoS charging), and reduce the administrative overhead of data errors on Suppliers, LDSOs and customers.	03/07/09
1303	SVA	Requirement on Half Hourly Data Collectors to Estimate Missing Reactive Power Demand Values	The estimation methods defined in section 4.2.1 of BSCP502 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS' have a proven track record of mitigating the impact of missing Active Power data on settlement processes. CP1303 recommends extending these methods to include Reactive Power. This would reduce the impact of missing data on DUoS charging and network management functions, and hence bring benefits to Suppliers, LDSOs and customers.	03/07/09

Appendix 5 - Release Information

Key to Release Plan

Change Proposals and Modification Proposals in **BLACK** text represents SVA changes, **RED** text represents CVA changes and **BLUE** text represents changes which impact both the SVA and CVA arrangements.

The Authority decision dates are provided in the following format:	
P	Modification Proposal number
(< date)	Date by which a determination must be made by the Authority in order for the Modification Proposal to be implemented within the indicated release
Pro✓/Pro✗	Indicates that the Panel's recommendation to the Authority was to Approve/Reject the proposed Modification
Alt✓/Alt✗	Indicates that the Panel's recommendation to the Authority was to Approve/Reject the Alternative Modification

		Release Date			
		November 2009 Scope (Imp. Date 05 Nov 09)	**February 2010 Scope (Imp. Date 25 Feb 10)**	**June 2010 Scope (Imp. Date 24 Jun 10)**	**Standalone Releases**
Change Proposals	**Pending**	1288	1267 v2.0, 1295, 1296, 1297, 1298, 1299, 1300, 1301, 1302, 1303	Currently there are no Change Proposals targeted at this Release.	There are currently no changes in a stand alone release.
	Approved	1248 v2.0, 1269, 1275 v2.0, 1278 v2.0, 1281, 1283, 1284, 1285, 1286, 1287, 1289, 1293, 1290, 1291, 1292, 1294			
Modifications	**Pending**		Currently there are no Modifications targeted at this Release.	Currently there are no Modifications targeted at this Release.	
	Approved	P217 Alt✓, P223 Alt✓, P234 Pro✓, P231 Pro✓, P232 Alt✓			
Updates		The November 2009 Release is currently progressing to time and quality. The scope of the Release has increased to cover 1 Housekeeping Modification and 9 additional Change Proposals. Industry review of the updated Code Subsidiary Documents (CSDs) for P223 and P217 has now completed. The P223 amendments were approved by SVG on 30 June. The P217 changes will be taken for ISG approval in July. All changes for the November 09 Release will be implemented on 5 November 2009 with the exception of P223 which has an implementation date of 1 December 2009.			

Draft CP Scope of the November 2009 Release

CP	Title	Impacts	BSC Agent (Demand Led)	ELEXON Operational		Total
				Man Days	Cost	
CP1248 v2.0	Early release of Meter Technical Details by the Non Half Hourly Meter Operator Agent	BSCP514, BSCP533 Appendix A and BSCP533 Appendix B	£4,200	3	£700	£4,900
CP1269	Publication of Additional Non Half Hourly Combination Data in Market Domain Data	BSCP509, BSCP509 Appendix, SVA Data Catalogue Vol. 1 and Vol. 2	£73,775	57	£12,540	£86,315
CP1275 v2.0	Supplier Agents – Access to Meter Protocols	CoP10, BSCP601	£0	2.5	£550	£550
CP1278 v2.0	Streamlining the SVA Standing Data Change Process	BSCP507, BSCP537 Appendix 1	£0	3.75	£825	£825
CP1281	Revenue Protection: requiring NHHDC to send EAC/AA data to the Supplier via the DTC.	BSCP504	£0	1	£220	£220
CP1283	Revisions to data correction processes in BSCP18	BSCP18, NETA IDD Part 2	£1,365	2	£440	£1,805
CP1284	Ability for Third Parties to raise Change Proposals and replacement of energywatch with National Consumer Council	BSCP40, PrA Service Description, Teleswitch Agent Service description	£0	2.5	£550	£550
CP1285	Unmetered Supplies: Clarification of Central Management System requirements	BSCP520	£0	1	£220	£220
CP1286	BSCP18 Operational Review: Additional flag in Transmission Company's BOAL file to indicate an amended Bid-Offer Acceptance	NETA IDD Part 2, BMRA URS, SAA URS	£0	2.5	£550	£550
CP1287	Correction of inconsistencies in BSCP536 'Supplier Charges'	BSCP536	£1,998	3	£660	£2,658
CP1289	Correction to the Level 4 password requirement in Code of Practice 2	CoP2	£0	1.25	£275	£275
CP1290	Rationalise and Simplify Unmetered Supplies requirements following a review by an Expert Group	BSCP520	£0	3	£660	£660
CP1291	Clarify requirements on Meter Administrators relating to Equivalent Meters	BSCP520	£0	2	£440	£440
CP1292	Clarify Meter Administrator requirements relating to PECU arrays	BSCP520	£0	2.5	£550	£550
CP1293	Housekeeping changes to BSCP537 Appendix 1 – Self Assessment Document (SAD)	BSCP537 Appendix 1	£0	0	£0	£0
CP1294	Housekeeping Change to SVA Data catalogue Volume 2	SVA DC Vol. 2	£0	0	£0	£0
		Total[15]	**£81,338**	**87**	**£19,180**	**£100,518**

[15] A Tolerance of 20% applies for both Demand Led costs and ELEXON Operational Costs