CPC00621 – Impact Assessment Responses for DCP0023, DCP0024, CP1217, CP1218, CP1219, CP1220, CP1221, CP1222, CP1223 and CP1224

DCP0023 - Movement of the functional requirements within PSL120 'Non Half Hourly Data Collection' to BSCP504 'Non Half Hourly Data Collection for SVA Metering Systems registered in the SMRS', following the creation of a generic non functional PSL (PSL100) via CP1182.

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
Stark Software International	HHDC, HHDA and **NHHDR**	✓
ScottishPower	MOA, Distributor, UMSO, **Supplier and NHHDC**	✓
RWE npower	Supplier & Supplier Agent	✓
EDF Energy	Supplier, NHHDC, NHHDA and MOP (NHH and HH)	✓
E.ON UK Energy Services Limited	**NHHDC**, HHDC, NHHDA, HHDA, NHHMOA and HHMOA	✓
IMServ Europe Ltd	HHDC/DA and MOP, NHHDC/DA and MOP	✓
AccuRead Ltd	**NHHDC / NHHDA / NHHMO**	✓
British Energy Power & Energy Trading Ltd	Trader, Party Agent and **Supplier**	X
Gemserv Ltd	**MRA Service Company**	-
CE Electric UK NEDL – YEDL	LDSO and UMSO	-
UDMS	HHDC, HHDA and NHHDA	-

Detailed Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Stark Software International	✓	-	X	-
ScottishPower	✓	**Impact**: Document Changes Only.	✓	0
RWE npower	✓	**Agree**: We have no immediate concerns or comments for this change.	X	-
EDF Energy	✓	**-**	X	-

E.ON UK Energy Services Limited	✓	**Agree**: This change is required to realise previously agreed strategic objectives. **Impact**: A preliminary review of the changes to the BSCP reveal no impact on our established systems & processes.	X	-
IMServ Europe Ltd	✓	-	X	90
AccuRead Ltd	✓	**Agree**: There are many occasions where the PSL text has been added to a particular section of the BSCP where it now undermines some standard practices and procedures that have previously been well defined. For example: In section 3.2.6.31 there has been text added that implies a new set of scheduling rules for Deemed Meter Reads being calculated and entered into settlement for CoS readings. There are a few other scenarios where this sort of thing occurs. **Impact**: We have many comments around the movement of the PSL to the BSCP but believe that the only way to gather all appropriate information about this would be to have an expert group etc meet and discuss the new additional text. Hopefully this will ensure that the wording causes as little disruption as possible while still enhancing the BSCP overall. This could potentially create a massive impact on our organisation if not dealt with correctly.	✓	356
British Energy Power & Energy Trading Ltd	X	**Disagree**: Our understanding of the scope of this CP was that it is to merge the documents, not to change the requirements. We have identified housekeeping adjustments to the BSCP in section 3.3.10.1 where 'Supplier' has been added to the 'To' field. We cannot agree to this DCP unless this change is justified. **Impact**: Systems and process changes	✓	90
Gemserv Ltd	-	**Impact**: MRA Products **Other Comments**: Changes to the MRA Products will only be implemented when the PSLs are removed. However, impacts on the MRA Products will be identified as the CPs and DCPs are issued for assessment. The following impacts have been identified: • MRA Clause 29.3.3 • WP116 and WP123	✓	-
CE Electric UK NEDL/YEDL	-	-	X	-
UDMS	-	-	X	-

DCP0024 - Population of the D0150 to indicate no meter present, when the NHHMOA holds no meter history.

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
Stark Software International	HHDC, HHDA and **NHHDR**	✓
ScottishPower	**Supplier, MOA, NHHDC,** UMSO **and Distributor**	✓
UDMS	HHDC, HHDA, NHHDA	✓
E.ON UK Energy Services Limited	NHHDC, HHDC, NHHDA, HHDA, **NHHMOA** and HHMOA	✓
CE Electric UK NEDL – YEDL	**LDSO** and UMSO	X
RWE npower	**NHHDC, NHHMO and Supplier**	X
British Energy Power & Energy Trading Ltd	Trader, Party Agent and **Supplier**	X
EDF Energy	Supplier, NHHDC, NHHDA, HHMOP and **NHHMOP**	X
IMServ Europe Ltd	HHDC HHDA **HHMOP**, NHHDC, NHHDA and **NHHMOP**	X
Gemserv Ltd	MRA Secretariat	-

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Stark Software International	✓	**Impact**: Minor coding changes only required	✓	30
ScottishPower	✓	**Agree**: The solution offered will partially resolve the issue. **Other Comments**: Though the solution resolves the immediate issue of non compliance with CP1180 further thought should be given to the D150 process. ELEXON should examine why scenario 2 and 3 occur. It seems to be a failure of MOA internal processes on retaining data and following the agreed process stipulated within the relevant BSCP. Scenario 3 occurs because an MOA has not met its BSC obligation to send the D149/D150. Emphasis should be placed on this being sent. In the case of scenario 2, an MOA should retain meter technical details after the removal of a meter from a site. These should then be sent to the new MOA. If this is not the case	✓	

		should an obligation be placed on the MOA to retain such information? However the materiality of this issue is important. If it is a very limited infrequent issue then the costs may not warrant such an effort and the DCP solution should suffice.		
UDMS	✓	-	X	-
E.ON UK Energy Services Limited	✓	**Agree**: A query has been raised as to which msmtd should be used. **Impact**: Changes to systems	✓	-
CE Electric UK NEDL/YEDL	X	**Disagree**: We agree that the "no meter installed" approach is suitable where this is actually the case i.e. new connection no meter yet, but not where a meter is present but the MOP is missing the data. It is not acceptable to state "no meter installed" because the old mop has failed to provide the new MOP with data for example. As a meter asset provider, the notification of "no meter installed" would actually stop us billing the relevant meter asset charges, therefore this will impact upon our income if a meter is in fact installed.	✓	-
RWE npower	X	**Disagree**: We have many questions raised by this change that we feel require resolution before we can approve it. While we agree that a change to this area is required, npower would like assurances regarding the manner in which this is performed. Scenarios two and three appear to be covered in CP1180, and as a result we would want to see a revised DCP containing only Scenario one. Npower would look to have this process documented in the BSCP, preferably in detail and diagrammatically, rather than as a footnote. Finally, npower would like to see an ELEXON organised meeting to discuss the End the End process, with NHHMOA, NHHDC and Supplier present to discuss the potential impacts. **Impact**: System and Processes **Implementation**: November 2008 is the first realistic achievable implementation date. **Other Comments**: Clarification is required regarding the wording about the term 'No Meter is present'. Does this mean that that the MOP doesn't hold any meter technical details or is it that there are physically no meters present for a particular MPAN? What will happen in the instance where sites are believed to have no meter present by the MOP but genuinely do have a meter?	✓	360

		Scenario 1. New Supply where no meter has yet been installed; Clarification is required regarding the wording about the term 'New Supply'. The assumption that we have made is that it refers to New Connections where there has been a subsequent Change of Supplier prior to meters been fitted – can this be clarified? **Scenario 2. Following a Change of Agent, where the old NHHMOA has previously removed the meter and has therefore not sent a D0150 to the current NHHMOA;** *This scenario shouldn't be necessary in this DCP due to the implementation of CP1180 in February 2008 which should address this issue.* This scenario recognises the fact that some NHHMOAs can't send D0150s however this needs qualifying as this issue should already have been addressed via CP1180. There will be historical MPANs that have already gone through this process. In terms of retrospective processing how does this DCP deal with re-processing of historic events - is this in scope or is this DCP only intended as being forward looking? This scenario puts the obligation on the new NHHMOA to send the new default D0150 information when the old NHHMOA can't do this. If this is the case what are the timelines for the default D0150 to be sent? How could the use of default data assist the Energisation status, when the NHHMOA will be primarily sending default data which may be inaccurate? **Scenario 3. Following a Change of Agent, where the old NHHMOA has failed to send the new NHHMOA the D0149/D0150 for meters that are installed;** *This scenario shouldn't be necessary in this DCP due to the implementation of CP1180 in February 2008 which should address this issue.* This scenario puts the obligation on the new NHHMOA to send the new default D0150 information when the old NHHMOA can't do this. If this is the case what are the timelines for the default D0150 to be sent? What are the implications of the new NHHMOA sending incorrect information regarding Energisation status? What obligations are there on the old NHHMOA to respond to repeated request for data from a new NHHMOA and (or) Supply, as the responsibility is on the old NHHMOA to give current accurate MTD? What obligations are there on the new NHHMOA to chase the old NHHMOA and (or) Supply for the data before a Default D0150 is sent out to parties? The implications are that MOP may have to send a D0150 for every new MPAN created when		

		responding with a D0011 where by default no MSMTD has yet been created. Our assumption is that this will only be required when there is a Change of Supplier prior to meters being fitted in which case default data can accurately be used? This DCP is proposing to append some additional text to the footnote in BSCP514 – would it useful to attach some process maps detailing these scenarios rather than additional text? Our view is that the whole footnote should be lifted and put into the body of the BSCP not just held as a footnote. Are there any industry volumes as to the number of MPANs affected by the issues documented in this DCP? If the action has been taken to deal with lack of data coming from old NHHMOA to new NHHMOAs what action can be taken to ensure data is passed in a timely manner? The original scope of CP1180 came from the Energisation status group. We perceive that there may be a conflict with the intended aims of this group by populating default data in the MTD. Failure of an old NHHMOA to send Meter Technical Details has an impact on the new NHHMOA – the obligation should be on the old NHHMOA to pass any information it has to the new NHHMOA. What action can be taken to ensure that this information is passed to the new NHHMOA? In the Change of Supply scenario whereby there has been a change of NHHMOA and NHHDC; if the new NHHDC receives a D0150 with default data then there's a potential that the D0086 might not be generated as there are no associated meter details or readings to populate the D0086. How would you identify between 'normal' D0150s and those that contain D0150 default data as 'normal' D0150's could also be populated in the same way as the proposed D0150s? If NHHDC receive a D0150 containing default data is the NHHDC obliged to use this D0150 even if it's been indicated by NHHMOA there's no meter on site? There are further implications in the E2E processes particularly with regards the impact this has on the NHHDC and their obligations to receive and process D0150s. As a result of CP1180 there should be an obligation put on the old NHHMOA to provide the new NHHMOA with any meter technical details (if applicable). This DCP has the potential of allowing a get-out clause and a potential of sending incorrect data to other parties. In principal we can see that there may be scenarios where there is a need to generate 'shortened' D0150s, but we need to know what this scenario is. The only scenario we can		

		see is New Supply with a subsequent Change of Supplier event where the existing NHHMOA have accurate information regarding the state of metering on an MPAN.		
British Energy	X	**Disagree**: We agree that it is appropriate for the NHHMOA to apply the proposed solution for scenario 1 and 2. However, we disagree that it should also be used for scenario 3. It would be incorrect for the new NHHMOA to provide a de-energised status for a MPAN just because the old NHHMOA has failed to send the D0149/D0150. What if there are energised meters installed? This would lead to incorrect data entering Settlements. The issue raised in Scenario 3 is a compliance issue between the old and new NHHMOA. The NHHMOAs should work together to ensure all relevant flows are sent in accordance with industry guidelines. **Impact**: Process changes	✓	30
EDF Energy	X	**Disagree**: We feel that this change is unnecessary. If a D0150 is received with just group 288 populated then this is sufficient for MOP to realise that no meter is present. Any additional validation of data in this group, as specified by this change, is unnecessary and requires making system changes for no benefit. We will provide mandatory data in this group but do not wish to make additional changes for to meet an unnecessary standard. **Impact**: System changes required to ensure that flows are populated with correct data in cases where no meter is on site.	✓	270
IMServ Europe Ltd	X	**Disagree**: The change attempts to comply with a requirement to send MTD where none exist. This solves the issue of completeness of data at the expense of accuracy by forcing the MOA to send information that is not available to them. In the worst case the new MOA will send MTD to the DC and Supplier which conflicts with existing data held. **Impact**: Existing Wheatley MOP system is not currently compliant and would require change. Alternatively manual procedures may be introduced at additional cost to the operation. **Implementation**: To make systems compliant requires a change to be agreed by the Wheatley MOP Consortium. **Other Comments**: Existing procedures state that the old MOA should send MTD to the new MOA on request. If this is adhered to then accurate details will exist in order for the new MOA to pass on negating the need for this change. Where no metering has been installed it should either be accepted that it is not possible to send MTD or an additional indicator should be introduced to show that the site is awaiting initial installation of metering.	✓	183-365
Gemserv Ltd	-	-	X	-

CP1217 - Discontinuing the BMRS High Grade Website

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
ScottishPower	Supplier, MOA, NHHDC, UMSO and Distributor	✓
EDF Energy	Supplier, NHHDC, NHHDA HHMOP and NHHMOP	✓
Gemserv Ltd	MRA Secretariat	-
CE Electric UK NEDL – YEDL	LDSO and UMSO	-
Stark Software International	HHDC, HHDA and NHHDR	-
RWE npower	Supplier and Supplier Agent	-
British Energy Power & Energy Trading Ltd	Trader and Party Agent	-
UDMS	HHDC, HHDA and NHHDA	-
Siemens Energy Services	Party Agent	-
E.ON UK Energy Services Limited	NHHDC, HHDC NHHDA, HHDA, NHHMOA, HHMOA	-

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
ScottishPower	✓	**Agree**: ScottishPower agrees with the removal of the high grade website as long as the current data messaging remains available. **Implementation**: As long as the existing interface between the BMRA systems and our own IT systems are unchanged.	X	0
EDF Energy	✓	-	X	0
Gemserv Ltd	-	-	X	-
CE Electric UK NEDL/YEDL	-	-	X	-
Stark Software International	-	-	X	-
RWE npower	-	**Neutral**: We have no comment to make on this change	X	
British Energy	-	-	X	-
UDMS	-	-	X	-
Siemens Energy Services	-	-	-	-
E.ON UK Energy Services Limited	-	-	-	-

CP1218 - Movement of the functional requirements within PSL 170 'Meter Administrator' to BSCP520 'Unmetered Supplies Registered in SMRS', following the creation of a generic non functional PSL via CP1182.

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
ScottishPower	Supplier, MOA, NHHDC, **UMSO and Distributor**	✓
RWE npower	Supplier and Supplier Agent	✓
British Energy Power & Energy Trading Ltd	Trader and Party Agent	✓
EDF Energy	Supplier, NHHDC, NHHDA, NHHMOP and HHMOP	✓
Power Data Associates	Not Indicated	✓
Siemens Energy Services	Party Agent, **DC and MA**	✓
Gemserv Ltd	MRA Secretariat	-
CE Electric UK NEDL – YEDL	LDSO and UMSO	-
Stark Software International	**HHDC**, HHDA and NHHDR	-
UDMS	HHDC, HHDA and NHHDA	-
E.ON UK Energy Services Limited	NHHDC, HHDC NHHDA, HHDA, NHHMOA, HHMOA	-

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
ScottishPower	✓	**Impact**: Document Changes Only **Other Comments**: Question Responses: 1) *Do you believe that a review of BSCP520 would be useful following the approval of CP1218?* Yes 2) *If yes, which areas of BSCP520 in particular would you suggest the review focuses on?* CP1218 states that some rewording and inconsistencies may arise, any such changes should be redlined and issued for comment. Therefore any review should only concentrate on the changes made to BSCP520.	✓	0
RWE npower	✓	**Agree**: We have no immediate comments or concerns regarding this change	-	-

British Energy	✓	-	X	0
EDF Energy	✓	**Comments**: Question Responses: 1) *Do you believe that a review of BSCP520 would be useful following the approval of CP1218?* No, We do not feel that a further review of BSCP 520 is required.	X	0
Power Data Associates	✓	**Impact**: Amendment to operational procedure documents **Other Comments**: Question Responses: As part of you Impact Assessment, please provide a response to the following questions: *1) Do you believe that a review of BSCP520 would be useful following the approval of CP1218?* Yes *2) If yes, which areas of BSCP520 in particular would you suggest the review focuses on?* References (1.2.4.1, 1.2.4.4 & 3.1.8) in the BSCP assume the LDSO determines the type of EM – the MA determines (and uses) the EM. If the LDSO needs to 'approve' type of EM, then this needs clarifying, yet if the EM is approved by the panel it seems unclear how the LDSO can not allow a particular type of EM in the area – would not occur with a type of meter. The definition of unmetered supplies needs linking to the SI. The MA does not receive MDD (a file as per DTC), but does need access to some data, such as valid participants. The Operational Information Document needs clearly referencing as part of MDD Location of PECU Array is determined by MA, some references link to Supplier (3.1.8) others to LDSO. Provision of lat & longitude from LDSO seems inappropriate (1.2.4 (c)) The 2006/07 ELEXON audit of MAs, indicted some issues surrounding the BSCP, such as effective from date of new inventories, these need discussion and possibly clarification included within the BSCP. There is inconsistency of the use of terms throughout the document – Time Switch Regime, the OID uses Switch Regime; Inventory of Apparatus compared with detailed inventory (section 1.5), summary inventory and P0064 – those 'in the know' understand, but it makes it more difficult for external parties to appreciate unmetered. Other sections do not reflect reality, eg P0068 technical details (3.9.1.4) – are not passed from MA to HHDC; data flow D0003 is not really used – so could be removed (3.1.18). Definitions (and elsewhere) – FLARE & LAMP are defined Lailoken is not – this should be amended to not mention specific systems, but to mention EMs approved by the Panel.	✓	30

		3.1.5 Note 2 refers to 'dummy MOA' – the role is MA (equivalent to MO) 3.1.15 text uses the term 'confirm' this infers a feedback loop, which is not required – suggest remove confirm, and/or make this step a separate step. 3.1.13 et al are repetitive in several sections of the document – it might be clearer to combine into a single section referred to by other sections 3.9.1.6 note 4 seems to have disappeared. 3.9.1.10 not sure if UMSO should request this – need to clarify the separate roles of UMSO & MA, when the BSCP was first drafted they were the same people, now they are separate and the BSCP needs to clearly define each parties roles. 3.9.1.11 & 12 and 3.14.4 not sure this step is required when data is really being sent from MA to HHDC, when originally drafted the BSCP envisaged data being 'collected' by HHDC 3.10.4 & 6 There is no step to receive an MDD file, so this step apparently is redundant! *The list could be longer, given more time/effort. If an issue group, or similar, is established then I would be able to go through in greater detail with comments.*		
Siemens Energy Services	✓	**Impact**: Process impact **Other Comments**: Question Responses: 1) Do you believe that a review of BSCP520 would be useful following the approval of CP1218? No, we do not believe a review is necessary. There are some processing issues with Unmetered sites but we do not think that a review of the documentation would improve these.	✓	30
Gemserv Ltd	-	-	X	-
CE Electric UK NEDL – YEDL	-	-	X	-
Stark Software International	-	**Comments**: Question responses: *1) Do you believe that a review of BSCP520 would be useful following the approval of CP1218?* NO	X	-
UDMS	-	-	X	-
E.ON UK Energy Services Limited	-	-	-	-

CP1219 - Inconsistencies within the CDCA Service Description and URS

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
ScottishPower	Supplier, MOA, NHHDC, UMSO and Distributor	✓
RWE npower	Supplier and Supplier Agent	✓
EDF Energy	Supplier, NHHDC, NHHDA, NHHMOP and HHMOP	✓
Gemserv Ltd	MRA Secretariat	-
CE Electric UK NEDL – YEDL	LDSO and UMSO	-
Stark Software International	HHDC, HHDA and NHHDR	-
British Energy Power & Energy Trading Ltd	Trader and Party Agent	-
UDMS	HHDC, HHDA and NHHDA	-
Siemens Energy Services	Party Agent, DC and MA	-
E.ON UK Energy Services Limited	NHHDC, HHDC NHHDA, HHDA, NHHMOA, HHMOA	-

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
ScottishPower	✓	-	X	0
RWE npower	✓	**Agree**: We have no immediate comments or concerns regarding this change	-	-
EDF Energy	✓	-	X	0
Gemserv Ltd	-	-	X	-
CE Electric UK NEDL – YEDL	-	-	X	-
Stark Software International	-	-	X	-
British Energy	-	-	X	-
UDMS	-	-	X	-
Siemens Energy Services	-	-	-	-
E.ON UK Energy Services Limited	-	-	-	-

CP1220 - Inconsistencies within the BMRA Service Description

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
ScottishPower	Supplier, MOA, NHHDC, UMSO and Distributor	✓
RWE npower	Supplier and Supplier Agent	✓
EDF Energy	Supplier, NHHDC, NHHDA, NHHMOP and HHMOP	✓
Gemserv Ltd	MRA Secretariat	-
CE Electric UK NEDL – YEDL	LDSO and UMSO	-
Stark Software International	HHDC, HHDA and NHHDR	-
British Energy Power & Energy Trading Ltd	Trader and Party Agent	-
UDMS	HHDC, HHDA and NHHDA	-
Siemens Energy Services	Party Agent, DC and MA	-
E.ON UK Energy Services Limited	NHHDC, HHDC NHHDA, HHDA, NHHMOA, HHMOA	-

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
ScottishPower	✓	-	X	0
RWE npower	✓	**Agree**: We have no immediate comments or concerns regarding this change	-	-
EDF Energy	✓	-	X	0
Gemserv Ltd	-	-	X	-
CE Electric UK NEDL – YEDL	-	-	X	-
Stark Software International	-	-	X	-
British Energy	-	-	X	-
UDMS	-	-	X	-
Siemens Energy Services	-	-	-	-
E.ON UK Energy Services Limited	-	-	-	-

CP1221 - Inconsistencies within the ECVAA Service Description

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
ScottishPower	Supplier, MOA, NHHDC, UMSO and Distributor	✓
RWE npower	Supplier and Supplier Agent	✓
EDF Energy	Supplier, NHHDC, NHHDA, NHHMOP and HHMOP	✓
Gemserv Ltd	MRA Secretariat	-
CE Electric UK NEDL – YEDL	LDSO and UMSO	-
Stark Software International	HHDC, HHDA and NHHDR	-
British Energy Power & Energy Trading Ltd	Trader and Party Agent	-
UDMS	HHDC, HHDA and NHHDA	-
Siemens Energy Services	Party Agent, DC and MA	-
E.ON UK Energy Services Limited	NHHDC, HHDC NHHDA, HHDA, NHHMOA, HHMOA	-

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
ScottishPower	✓	-	X	0
RWE npower	✓	**Agree**: We have no immediate comments or concerns regarding this change	-	-
EDF Energy	✓	-	X	0
Gemserv Ltd	-	-	X	-
CE Electric UK NEDL – YEDL	-	-	X	-
Stark Software International	-	-	X	-
British Energy	-	-	X	-
UDMS	-	-	X	-
Siemens Energy Services	-	-	-	-
E.ON UK Energy Services Limited	-	-	-	-

CP1222 - Inconsistencies within the SAA Service Description and URS

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
ScottishPower	Supplier, MOA, NHHDC, UMSO and Distributor	✓
RWE npower	Supplier and Supplier Agent	✓
EDF Energy	Supplier, NHHDC, NHHDA, NHHMOP and HHMOP	✓
Gemserv Ltd	MRA Secretariat	-
CE Electric UK NEDL – YEDL	LDSO and UMSO	-
Stark Software International	HHDC, HHDA and NHHDR	-
British Energy Power & Energy Trading Ltd	Trader and Party Agent	-
UDMS	HHDC, HHDA and NHHDA	-
Siemens Energy Services	Party Agent, DC and MA	-
E.ON UK Energy Services Limited	NHHDC, HHDC NHHDA, HHDA, NHHMOA, HHMOA	-

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
ScottishPower	✓	-	X	0
RWE npower	✓	**Agree**: We have no immediate comments or concerns regarding this change	-	-
EDF Energy	✓	-	X	0
Gemserv Ltd	-	-	X	-
CE Electric UK NEDL – YEDL	-	-	X	-
Stark Software International	-	-	X	-
British Energy	-	-	X	-
UDMS	-	-	X	-
Siemens Energy Services	-	-	-	-
E.ON UK Energy Services Limited	-	-	-	-

CP1223 - Inconsistencies within the Code Subsidiary Documents regarding Business Requirements

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
ScottishPower	Supplier, MOA, NHHDC, UMSO and Distributor	✓
RWE npower	Supplier and Supplier Agent	✓
EDF Energy	Supplier, NHHDC, NHHDA, NHHMOP and HHMOP	✓
Gemserv Ltd	MRA Secretariat	-
CE Electric UK NEDL – YEDL	LDSO and UMSO	-
Stark Software International	HHDC, HHDA and NHHDR	-
British Energy Power & Energy Trading Ltd	Trader and Party Agent	-
UDMS	HHDC, HHDA and NHHDA	-
Siemens Energy Services	Party Agent, DC and MA	-
E.ON UK Energy Services Limited	NHHDC, HHDC NHHDA, HHDA, NHHMOA, HHMOA	-

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
ScottishPower	✓	-	X	0
RWE npower	✓	**Agree**: We have no immediate comments or concerns regarding this change	-	-
EDF Energy	✓	-	X	0
Gemserv Ltd	-	-	X	-
CE Electric UK NEDL – YEDL	-	-	X	-
Stark Software International	-	-	X	-
British Energy	-	-	X	-
UDMS	-	-	X	-
Siemens Energy Services	-	-	-	-
E.ON UK Energy Services Limited	-	-	-	-

CP1224 - The Review of Code of Practice 4

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
Stark Software International	**HHDC**, HHDA and NHHDR	✓
ScottishPower	Supplier, **MOA**, NHHDC, UMSO and **Distributor**	✓
RWE npower	Supplier and Supplier Agent	✓
British Energy Power & Energy Trading Ltd	Trader, Party Agent and **CVA MOA**	✓
Western Power Distribution	**MOA**	✓
Siemens Energy Services	Party Agent, DC, MA, **CVA HHMO**	✓
E.ON UK Energy Services Limited	NHHDC, HHDC NHHDA, HHDA, NHHMOA, **HHMOA**	✓
Gemserv Ltd	MRA Secretariat	-
CE Electric UK NEDL – YEDL	LDSO and UMSO	-
UK Metering Forum (UKMF)	N/A	-
UDMS	HHDC, HHDA, NHHDA, **HHMOA**	-
EDF Energy	Supplier, NHHDC, NHHDA, NHHMOP and HHMOP	-

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Stark Software International	✓	**Impact**: None **Would implementation in the proposed Release have an adverse impact?** No	X	30
ScottishPower	✓	**Agree**: The COP is now of a standard to be used by industry. **Impact**: Processes may need to be updated to reflect the changes within the revised COP **Would implementation in the proposed Release have an adverse impact?** No	✓	180
RWE npower	✓	**Agree**: We support this change with some minor amendments to the text to correct inconsistencies, or to resolve ambiguities	X	-
British Energy	✓	**Agree**: Agreed subject to satisfactory resolution of comments raised. **Impact**: Process change only **Would implementation in the proposed Release have an adverse impact?** No	✓	90

Western Power Distribution	✓	**Impact**: Process changes **Implementation**: No significant changes. **Would implementation in the proposed Release have an adverse impact?** No	✓	30
Siemens Energy Services	✓	**Impact**: Process impact **Implementation**: No adverse impact **Other Comments**: With reference to the tables in Appendix B, please could clarification be provided as to what the letters in brackets refer to. The footnote states that "..Letters are for cross reference only", please could you confirm what to cross reference this against.	✓	
E.ON UK Energy Services Limited	✓	**Agree**: We support the proposed changes as bringing clarity & consistency to the present arrangements. **Impact**: Potential changes to operational activities	X	-
Gemserv Ltd	-	-	X	-
CE Electric UK NEDL – YEDL	-	-	X	-
UK Metering Forum (UKMF)	-	**Comments**: <u>Appendix B. Test points</u> <u>Appendix C. Measured Errors</u> The UKMF feels that it is unnecessary and unduly complicates matters to add references to meter Class in the headings to tables B1-B5 and references to metering system Codes in the headings to tables C1-C3, for the following reasons. In carrying out accuracy testing a meter cannot be tested at an infinite number of load points - it is necessary to get the best 'snapshot' by defining the number and value of such points. This is what Appendix B does and the criteria is the nature and materiality of the **load** which the meter is intended to measure. Appendix B is therefore related to the metering system Codes 1, 2, 3, 5, (etc) for which there are significant differences between loads of systems covered by Codes 1&2 (especially, for instance, generator loads) and Codes 3&4, rather than any individual type or Class of meter used. The link to meter Class is that, having determined the relevant test load points for a particular metering Code, cross reference to Appendix C for the specific Class of meter under test will give the required accuracy limits at that load value. This is explained in the preamble to Appendix B and is perfectly clear. The meter under test will be one which complies with the relevant Code, but may in fact exceed its	-	-

		requirements (ie be of a higher Class). This does not matter as tests will relate to the Class of meter, which is being tested as a stand-alone device, rather than the system accuracy requirements of the metering system Code for which it is intended to be used. Appendix C is thus unrelated to metering system Codes - it merely indicates accuracy limits at various loads/power factors to which the meter has been manufactured to meet its Class requirements as set out in relevant standards (as referenced in section 3 of CoP 4) **The proposal is therefore that these added references be deleted** There follows an example of difficulties which cross-referencing creates Example for a CoP5 Meter. CoP5 4.2.1 (i) "Overall Accuracy of the Defined Metering Point shall at all times be:- (From the Active Energy table) 100% - 20% load = ± 1.5% 20% - 5% load = ± 2.5%" So an M.O. will nearly always fit a cl 1.0 active energy meter to comply with the above, which will have a cl 2.0 reactive energy meter built integrally. Under the proposed CoP4, if this cl1 active, cl2 reactive meter is returned to a test house for type C testing then the following would take place:- Table B5 would identify the test points: The recent addition of the text (class 3) in the 'Reactive Meter' Header does not accommodate the class 2 reactive component of the class 1 active energy meter! Table C1 details the meter's class 1 active energy accuracy requirements but unfortunately ties it to (CoP3) in the title. Table C3 details the meter's class 2 reactive energy accuracy requirements but unfortunately ties it to (CoP1) in the title		
UDMS	-	-	X	-
EDF Energy	-	**Neutral**: Ending requirement for class 0.2S meters to be Laboratory calibrated may result in a significant loss of UKAS calibration income. **Other Comments**: At present this company is UKAS Accredited for Laboratory as well as on-site calibrations. It is regretted that this cost burden may prove difficult to justify against organisations meeting minimum CoP4 standards. For us and other organisations in a similar position, UKAS does ensure continuing high quality and technical competence. Lower transportation costs may result from the relaxation of the 5 (to 10) year interval for site testing. It is not certain at this stage if our customers will continue to use our UKAS calibration facilities for class 0.2S meters.	X	0

Comments on redline text

No.	Organisation	Section	Comment
1	British Energy	CoP4 Index	CPC00621 : CP 1224 Impact Assessment of CoP 4 Issue 6 (v.5.0) dated 26/10/07 (NOTE : Where relevant, references are made below to Elexon's 30/10/07 collated responses to EG draft review comments under CPC00615/DCP005V2.0 against CoP4 Issue 5 V4.5) The CoP4 Index use of bold type, line spacing and indentation for Section 8 (as updated to address Collated Response 36) is inconsistent with that used for Section 5. The same applies to the Index for Section 7. Related Comment 21 below also refers.
2	British Energy	CoP4 Section 2	Section 2 : In the final sentence "…requirements are of a lower the difference…" should be amended to read ""…requirements are lower the difference…".
3	British Energy	CoP4 Section 3	Section 3 etc. (Collated Response 38 Comment 7) : As SI numbering is dependent on the year of publication, BE suggest all instances of "SI 1566" should be written "SI (1998) 1566". Similarly, all references to "SI 1679" should read "SI (2006) 1679".
4	British Energy	CoP4 Section 4.10	Under Section 4.10, "electricity" should read "Electricity"
5	British Energy	CoP4 Section 4.21(a)	Section 4.21(a) etc. (Collated Response 38 Comment 9) : BE agree the Elexon reply for Section 5.1.4.1 but do not agree this reply for Sections 5.3.3, 7.4 or 8.2, which make no references to dates. Either all these latter Sections or 4.21(a) should be amended to include dates as mandatory data.
6	British Energy	CoP4 Section 5.1.1	Section 5.1.1 – Please insert a space between Paragraphs 3 and 4.
7	British Energy	CoP4 Section 5.1.1 Para 4	Section 5.1.1 Para 4 (Collated Response 38 Comment 12) : BE still disagrees with the approach here which appears to be based on the assumption that the basic accuracy of blank calibrated meters would never drift regardless of the length or conditions of storage before installation. Since BE believes this cannot be guaranteed, logic suggests software-based compensation should be applied with the same safeguards to all suitable meters (i.e. either with or without Type C Calibrations) regardless of whether they are blank calibrated, previously compensated spares being installed on new circuits or previously compensated meters requiring re-compensation for use on the same circuits following CT, VT or power transformer changes.
8	British Energy	CoP4 Section 5.1.2.1 Para 3	Section 5.1.2.1 Para 3 (Collated Response 38 Comment 14) : BE still consider testing of pulsed output at a single load point to be inadequate. The primary purpose of CoP4 is to define required levels of accuracy of outputs for SETTLEMENT (i.e. pulses). By implication, the accuracy of outputs for TESTING (i.e. LEDs) or for MAR READS (i.e. registers) should be of secondary importance. The BE 28/06/06 email (and attachments) to K Campion pointed out that Cewe CoP1/2 meters type CEP and CEQ have shared metrology for power measurement and separate divider circuits for pulses, registers and LEDs on which deviations between separate outputs have been found in practice (i.e. the cause of known pulse errors identified from main/check differences could not be identified by accuracy tests using LEDs but were identified by testing of pulses) Although we do not know how many other meters share similar designs now or in the future, BE consider this matter should be reconsidered at

			least for Type A and Type C Calibrations.
9	British Energy	CoP4 Section 5.1.2.2	For clarity and consistency with 5.1.2.1, please amend sentence 2 of 5.1.2.2 to read “These tests may be conducted on site and shall cover the load points specified in Appendix B Section 2.”
10	British Energy	CoP4 Section 5.1.2.4 Para 2 2nd sentence	The 2nd sentence of Paragraph 2 of 5.1.2.4 includes a reference to footnote 2. BE suggests this needs clarification or deletion.
11	British Energy	CoP4 Section 5.1.2.4	Section 5.1.2.4 (Collated Response 43) : Although Elexon’s DCP0005 v2.0/CPC00615 reply stated it had been actioned (unclear how or where), NGT’s comment related to 5.1.2.4 (which has no reference to 2%). Was this a typographical error and did NGT actually mean 20% per annum? Please clarify both NGT’s intent and Elexon’s response.
12	British Energy	CoP4 Section 5.1.2.6	Section 5.1.2.6: Please either clarify the purpose of the words “save for the requirement to perform a Type A Calibration” (bearing in mind this Section deals with transitional arrangements for existing CoP1 & 2 Meters), or delete them.
13	British Energy	CoP4 Section 5.1.4.1 Para 4	Section 5.1.4.1: For consistency with Paras 1 and 5, BE suggest “purchased” in Para 4 should be amended to read “ordered” (as previously shown on the 26/10/07 Draft CoP4 issued with DCP0005 v2.0/CPC00615). Also see Comment 19 below.
14	British Energy	CoP4 Section 5.1.4.2 Para 2	Paragraph 2 of 5.1.4.2 : BE suggests “(including sample Calibrations)” should be deleted here as Section 5.2 already refers to Schedule E2 for sample Calibrations.
15	British Energy	CoP4 Section 5.2 Para 4	Section 5.2 Para 4 (Collated Response 38 Comment 29) : While BE accepts footnote 5 covers the point raised, it uses words which are much more appropriate to 5.1 than 5.2. Also "in that year" is not required and may cause confusion. BE suggest for clarity Elexon should re-consider using the following text as proposed by BE in the DCP0005 v2.0/CPC00615 review : “Where periodic calibrations exceed stated sample Calibration rates, separate sample Calibrations are not required.”
16	British Energy	CoP4 Section 5.2 Para 4	Section 5.2 Para 4 (Collated Response 35) : As 1% has been changed to 2%, BE suggests the requirements be changed to a minimum of 2 for less than 100 (unless there is only one). Statistically, the results of sample testing a single meter would be of limited or no value.
17	British Energy	CoP4 Section 5.3.1 Para 4	Section 5.3.1 Para 4: BE is concerned that the limit of up to “1.5 times the permitted errors” seems high for CoP 1& 2. Please double check with source/author and confirm this is correct.
18	British Energy	CoP4 Section 5.3.3 Para 1	Section 5.3.3 Para 1 (Collated Response 38 Comment 32) : BE believe the term "as appropriate" should not be used here and suggest it should either be deleted or replaced by "at the discretion of the equipment purchaser" per Elexon’s reply.
19	British Energy	CoP4 Section 5.3.3	Section 5.3.3 Para 4: BE suggests “manufactured” should read “ordered”.

		Para 4	
20	British Energy	CoP4 Section 7.2.2.2	Section 7.2.2.2 (Collated Response 38 Comment 47) : BE note Elexon's commitment to add further references (similar to footnote 7) throughout CoP4 prior to release. Siemens Collated Response 37 also refers. The issue of a draft CoP4 Guidance Document for industry review is now awaited.
21	British Energy	CoP4 Sections 7.1.1, 7.1.2, 7.2.1, 7.2.2, 7.2.3, 7.3.1 and 7.3.2	For consistency of presentation with Section 5 and 7.3.3, BE suggests sub-headings 7.1.1, 7.1.2, 7.2.1, 7.2.2, 7.2.3, 7.3.1 and 7.3.2 should not be underlined but should be in bold type.
22	British Energy	CoP4 Section 8	Section 8 (Collated Response 38 Comments 49, 55 (first part) & 57): Bearing in mind this Section covers "Calibration Equipment for Measurement Transformers", BE suggest the words "...measurement transformers..." in Para 1 of 8.2 should read "...Reference Standard measurement transformers..." and footnote 8 should be deleted.
23	British Energy	CoP4 Appendix B Para 2	BE is concerned that the example given in Appendix B Para 2 may mislead rather than enlighten. As written it suggests matching a Table C2 accuracy limit with a Table B2 test point which is not actually specified. In practice MOAs should be testing at the points required by Appendix B and comparing results with matching or nearest available Appendix C limits. BE has identified two instances where the latter process will be necessary and suggests one of these should be used as the example. Alternatively, the example should be deleted and both of these cases should be explicitly clarified : (a) Tables B1 and B4 require CoP2 Class 0.5 active meters to be tested with 0.1In at unity power factor, but there is no corresponding accuracy limit stated for this in Table C2 (b) Tables B1 and B4 require CoP2 Class 0.5 active meters to be tested with 0.2In at 0.5 inductive and 0.8 capacitive, but there are no corresponding accuracy limits stated for these in Table C2
24	British Energy	CoP4 Appendix B	Appendix B : Please confirm whether the numbers in brackets after "X" and "Y" in CoP4 Tables B1 – B5 are references to SI (1998) 1566 Schedule 1 Table 2 and Schedule 3 Table 2 test numbers. If so, BE suggests this should be made clearer in the Notes under each of the Appendix B tables.
25	British Energy	CoP4 Appendix B	Appendix B (Collated Response 38 Comment 60) : References are made in Tables B2, B4 and B5 to "X(a)" and "X(b)". Underneath the NOTES state "Letters are for cross reference only". Although these are assumed to relate to SI (1998) 1566, this document includes many references to "(a)" and "(b)". Please either clarify the purpose and interpretation of these suffixes or delete them.
26	British Energy	CoP4 Appendix B	Appendix B (Collated Response 38 Comment 67) : Item 3 under the heading "Type B Meter Calibration for Codes of Practice 3, 5, 6 and 7" (Page 31) states "only active meters need to be tested for Type B Calibrations" (i.e. reactive meters are excluded). However the penultimate paragraph of Appendix A (Page 27) states "intervals between calibrations for Reactive CoP 3 and 5 meters are the same as the intervals for Active CoP 3 and 5 meters" (although missing references to the requirements for CoP 6 & 7 Reactive meters – where used – should be added). BE believes these inconsistencies should be eliminated.

27	British Energy	CoP4 Table B1	Table B1 (Collated Response 38 Comment 61) : Previously, overload currents covered 120, 150 and 200%. Please explain why 1.0Imax has been added. BE note that although Elexon have emailed a copy of the WPD document in which Ian Dobson proposed some Table B1 – B5 changes, it did not clarify the reasons or the source. If retained, would it mean a 5A meter with an 1.0Imax of 7.5A on a circuit rated for 120% overload would need to be tested at 7.5A (i.e. 150%) only or at both 120% and 150%?
28	British Energy	CoP4 Tables B1, B2, B3 and B5	Tables B1, B2, B4 & B5 (Collated Response 38 Comment 62) : BE requests clarification of the purpose and application of the final row "1.0In Export" test (added to Issue 5 V4.5). For example, the related note seems to imply that meters using the same element for import and export should be tested at all the above-listed test points for import only and at unity power factor and 100% In for export only (even on generator meters which usually export 100% of the time). It also seems to imply that meters using separate elements for import and export should be tested at all the above-listed test points for both import and export (but excluding the new "1.0In Export" test). Are these the intended interpretations? BE note that although Elexon have emailed a copy of the WPD document in which Ian Dobson proposed some Table B1 – B5 changes, it did not clarify the reasons or the source.
29	British Energy	CoP4	Further to Comment 28 above, BE would point out that the equivalent Note under Table B3 seems to specify a similar requirement but the "In Export" test point is excluded. Please clarify how and why this requirement differs from those on Tables B1, B2, B4 & B5. If in fact they are the same requirement, BE suggests the approach used in Table B3 is significantly clearer and should be applied to Tables B1, B2, B4 & B5 to address the concerns raised in Comment 28
30	British Energy	CoP4 Tables B1 and B4	Tables B1 & B4 (Collated Response 38 Comment 66) : To address BE comments on DCP0005 v2.0/CPC00615, Elexon have amended Table B3 Notes against "**" to refer to "1.0IMax" in place of "IMax". For consistency, BE suggests the same change is also applied to the Notes under Tables B1 and B4.
31	British Energy	CoP4 Table B2	Table B2 (Collated Response 27) : Bearing in mind CoP6 and CoP7 both refer to reactive energy measurement where required (albeit with references back to CoP5), BE believe the "CoP3 and 5 only" caveat in the heading should be deleted.
32	British Energy	CoP4 Table B2	Table B2 (Collated Response 38 Comment 63) : The second row previously covered 20% current. Please explain (why this has now been replaced by 1.0Ib/In (i.e. tests are now only at 5% and 100%). Also, please explain why the active meters on this row have changed from "#" (each element on its own) to "X,Y" (all elements combined and each element on its own). BE note that although Elexon have emailed a copy of the WPD document in which Ian Dobson proposed Table B1 – B5 changes, it did not clarify the reasons or the source.
33	British Energy	CoP4 Table B2	Table B2 (Collated Response 38 Comment 64) : Please explain why all test points previously shown as "#" (each element on its own), all the others (excluding those on the second row as referenced above) have changed to "X" (all elements combined). BE note that although Elexon have emailed a copy of the WPD document in which Ian Dobson proposed some Table B1 – B5 changes, it did not clarify the reasons or the source.
34	British Energy	CoP4 Table B3	Table B3 (Collated Response 16) : As written, the Elexon response does not cover SMRS. BE understands some systems in SMRS include Code 2 meters and if so, the Table B3 Note needs to cover these.

35	British Energy	CoP4 Table B3 and B4 etc.	Tables B3 & B4 etc. (Collated Response 17) : BE consider the relationship between CoP4 and SI (1998) 1566 is not clear in some instances and requires explanation : In some cases different terms and tests appear to be used. Schedule 1 of the SI refers to "Manufacturer" and "Authorised Repairer" while Schedule 3 refers to "Certification". Please confirm SI Schedule 1 is relevant to CoP4 Type A (i.e. Manufacturer) and Type C tests (i.e. Repairer = Test House/Accredited Laboratory) and SI Schedule 3 is relevant to CoP4 Type B tests (i.e. Certification = MOA). Please also confirm SI Schedule 1 & 3 Method A & B tests, which appear to involve on-load comparisons with precision test meters, are similar to commissioning prevailing load tests (now removed from CoP4), and SI Schedule 1 & 3 Method C tests with "constant power over specified period" are the same as CoP4 injection tests.
36	British Energy	CoP4 Table B4	Table B4 : The use of "(3)" on "X" against 0.01In for unity power factor active meters in Table B4 is not understood. This differs from the "X" for 0.01In in Table B1 and in Tables B1, B2, B3 and B5 "(3)" relates to 0.05In. Please clarify. Similarly, should "X,Y" in Table B4 for active meters at unity power factor and 0.05In read "X(3),Y"?
37	British Energy	CoP4 Table B4	Table B4 (Collated Response 38 Comment 69) : Please clarify why the previous requirements for reactive meter tests "@" (all elements combined) and "#" (each element on its own) at 100% current and zero power factor have been replaced by only "X" (all elements combined).
38	British Energy	CoP4 Table B5	Table B5 (Collated Response 19) : Please clarify why the active unity power factor export test on Table B5 should refer to "1.0 Ib/In" while the equivalent tests on Tables B1, B2 & B4 refer to 1.0In
39	British Energy	CoP4 Table B5	Table B5 (Collated Response 38 Comment 70) : Please confirm whether the second row for active meters at 0.5 inductive power factor should have test point "X(4)" in line with Table B2. In addition, BE questions on Table B2 above (Comment 32) regarding replacement of 20% testing and the use of "X,Y" in place of "#" also apply to Table B5.
40	British Energy	CoP4 Table B2, B5 and C2	Although Table C2 has error limits for Class 1 meters at 0.8 capacitive, there are no test points on Tables B2 or B5 for these. Should Tables B2 & B5 be amended to include these or should the Class 1 limits at this power factor be deleted (as they have been for Class 2)?
41	British Energy	CoP4 Table B3	Table B3 shows the same limits at zero power factor and at 0.866 inductive/capacitive for both Class 2 and 3 reactive meters. Please check BS EN 62053-23 and confirm these are correct.
42	British Energy	CoP4 Table D1	Table D1 refers to numerical footnotes 1, 2 & 3. Table D2 also refers to footnote 3. To distinguish these from the other footnotes running through the document, BE suggests alpha references should be used.
43	British Energy	CoP4 Table D2	Table D2 (Collated Response 38 Comment 85) : BE note that although for every class of meter in Table D1 and for class 0.2S and 0.5 meters in Table D2, uncertainties are higher (and in most cases, double) at "other than unity" than they are at "unity power factor", for some reason this is not currently the case for meter Classes 1 and 2 in Table D2. We consider this apparent lack of consistency must be double checked with the author/source and confirmed prior to the release of CoP4.
44	British Energy	CoP4 Table D4	Table D4 (Collated Response 38 Comment 86) : BE considers it is essential for consistency with (i) Table B3 Type B Calibrations for reactive meters at 0.866 Inductive and Reactive, and with (ii) corresponding accuracy limits in

			Table C3, that "other than unity power factor" uncertainty limits be added to Table D4. We suggest the author/source should be consulted for this information.
45	RWE npower	Section 5.2 Sample Calibrations Third paragraph Page 17	There are different requirements for CVA and SVA metering systems. Other areas of the document use CoPs 1&2 and CoPs 3, 5, 6 & 7 when less stringent requirements apply. This section should have CVA replaced by CoPs 1&2 and SVA replaced by CoPs 3, 5, 6 & 7 to ensure consistency through out the document..
46	RWE npower	Page 29 Tables B1, B2, B4 & B5	- Tables B1, B2, B4 & B5 are unclear and assume that Import is the predominant direction for all meters. The line 1.0 In Export~ should be removed and the wording from table B3 used in the notes for these tables "These tests shall be carried out for Import/Export directions, as registered with the CDCA for a given metering point. If the same measuring element is used for both Import and Export one additional test point only (at 1.0 In, Unity power factor, balanced) is required in the reverse direction." - The wording below Tables B1, B2, B4 & B5 states that "Letters are for cross reference only." What are they cross referenced to?
47	RWE npower	Page 35 Table D4	- There are no uncertainty requirements for measurements at other than zero power factor for Type B calibrations. Yet table B3 clearly states that points at system power factors of 0.866 Inductive and Capacitive must be tested.
48	EDF Energy	CoP4 Section 2.	Incorrect wording last sentence
49	EDF Energy	CoP4 Section 4.18	Calibration at a given temperature will prove performance at that temperature. Specification may be known over a range of temperatures for which a temperature coefficient may be used to modify. Change to "at which that apparatus has been calibrated".
50	EDF Energy	CoP4 Section 4.21	Needs a further section d) All calibrations and measurements are linked to national measurement standards.
51	EDF Energy	CoP4 Section 5.1.1. Para 4	Reference to a QA system to ensure compensation is properly applied should be deleted and in all cases the last sentence should apply.
52	EDF Energy	CoP4 Section 5.1.2.1. Para 2	Does not state who should carry out Type A calibration in absence of manufacturer. Manufacturer's accreditation should be stated. An Accredited Laboratory should be used in absence of manufacturer.
53	EDF Energy	CoP4 Section 5.1.2.1. Para 4	A Blank Calibrated Meter should be calibrated again after compensations have been applied see 5.1.1.
54	EDF Energy	CoP4	Actual errors should be given on calibration certificates rather than certificates of conformance, known as

		Section 5.1.4.1. Para 1	certificates of convenience.
55	EDF Energy	CoP4 Section 5.1.4.1. Para 1	Results shall include a measurement uncertainty "evaluation".
56	EDF Energy	CoP4 Section 5.1.4.1. Para 2	Calibration certificates need a unique identification and the name of the person conducting the tests, in addition to the environmental conditions and the calibration results.
57	EDF Energy	CoP4 Section 5.1.4.1. Para 10	Calibrations must be performed on meters in the state they are in when they are used for settlement. See 5.1.1.
58	EDF Energy	CoP4 Section 5.5.1. Para 2	Rather than 2 years, the industry norm of 12 months should be applied. Guidance should be given in instances where instruments are found to be out of specification upon recalibration.
59	EDF Energy	CoP4 Section 7.i	UKAS is an *accreditation* body to assess organisations that provide certification services.
60	EDF Energy	CoP4 Section 7.1.1.1	Reference standards shall be maintained at reference temperature ±2ºC and the effect of this temperature variation shall be allowed for etc.
61	EDF Energy	CoP4 Section 7.2.1.1	As above for Transfer Standards.
62	EDF Energy	CoP4 Section 7.3.2.2	Some guidance is necessary as to the scope/coverage of the 3 monthly calibrations.
63	EDF Energy	CoP4 Section 8i	UKAS is an accreditation body see 7i
64	EDF Energy	CoP4 Table B1	A reactive meter will go reverse on 0.866 capacitive. Test should be -0.866 inductive. Tests should be to power angles of 90º, 30º. 150º. Element tests are not relevant for 3P3W meters.
65	EDF Energy	CoP4 Table B2	Element tests are not relevant for 3P3W meters
66	EDF Energy	CoP4 Table B3	As Table B1, not element tests
67	EDF Energy	CoP4 Table B4	As Table B1
68	EDF Energy	CoP4 Table B5	As Table B2
69	EDF Energy	CoP4 Table C2	As Table B1, not element tests
70	EDF Energy	CoP4 Table C3	As Table B1, not element tests

71	EDF Energy	CoP4 Tables D1,2,3,4,	The heading for this section is "Appendix D Measurement Uncertainty" but Table D1 just refers to "maximum overall uncertainty of calibration equipment" so the *measurement* uncertainty needs to be stated.
72	EDF Energy	CoP4 Appendix D Note 10	This is not measurement uncertainty and so will not be in accordance with UKAS M3003.
72	Western Power Distribution	CoP4 Section 5.1.2.4/5.1.2.6	5.1.2.4 declares that for 10 years, only 20% need to be sampled, but at the end (ie in 2018), all meters must be compliant - ie 100% tested. It also states that re-tests will follow this Type C test to the schedule in appendix A. The next test (B for row 2 or C for row 1 in App A) would then be 5 or 10 years from the first test in the 10 year transition period. However, 5.1.2.6 can be read to mean year 10 (ie 2018) will be year zero, so the next test would be 5 or 10 years from then, rather than the last test. This could mean no tests are undertaken between 2018 and 2023/2028. I therefore suggest the following rewording of 5.1.2.4 and the deletion of 5.1.2.6: "5.1.2.4 Transitional Arrangements for Periodic Calibrations for existing CoP1 and 2 Meters For existing Meters for Code of Practice 1 and 2 installations that have been installed for at least 5 years prior to effective date of Issue 6, Version 5.0 of CoP4, the following requirement replaces the need for both sample and periodic Calibrations (as defined in previous issues of CoP4): 5.1.2.4.1 During the 10 year period from the effective date of Issue 6, Version 5.0 of CoP4, at least 20% of the total of each such Meter Type shall be Type C calibrated without Adjustment and the results of such Calibration shall be recorded. Any Meter that is found to be outside of the required accuracy must either be replaced or Adjusted and re-calibrated until CoP4 compliant accuracy is achieved3; 5.1.2.4.2 By the end of the 10 year period, all existing meters shall have been Type B or Type C calibrated 5.1.2.4.3 Once existing meters have been subject to a Type B or Type C test in accordance with 5.1.2.4.1 or 5.1.2.4.2, they will then be subject to re-calibrations in accordance with appendix A, except that the Type C test undertaken in 5.1.2.4.1 or 5.1.2.4.2 replaces the initial Type A test and "year zero" in appendix A is the year of the Type C test. Where the first test undertaken in the transition period is a Type B test, then this is to be treated as the first Type B test of Appendix B. 5.1.2.4.4 For the avoidance of doubt any Code of Practice 1 or 2 Meters installed in the five years preceding the effective date of Issue 6, Version 5.0 of CoP4 must comply with the Calibration requirements in Appendix A."
73	Western Power Distribution	CoP4 Appendix A	Delete markup line
74	Western Power Distribution	CoP4 Table B3	"These tests shall be carried out for Import/Export directions, as registered with the CMRS or SMRS for a given metering point.