

CPC00615 – Impact Assessment Responses for DCP0005 v2.0, DCP0013, DCP0014, DCP0015, CP1192 v2.0, CP1208, CP1209, CP1211, CP1212, CP1213, and CP1214

DCP0005 v2.0 - The Review of Code of Practice 4

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Western Power Distribution	✓	Implementation Comment: We will need to make LDSO system and process changes and amend procurement contracts due to the additional requirements concerning test certificates.	✓	180
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓	Impact Comment: Minor system and process changes.	✓	-
E.ON UK Energy Services Limited	✓	Agree Change Comment: We are happy to support this version of COP4 Impact Comment: Changes will be required to a broad selection of systems & processes to implement the new version of COP4	✓	-
ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd	✓	-	✓	180

Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;	✓	-	X	0
Siemens Energy Services	X	Disagree Change Comment: Errors prevent Issue 5 Ver 4.5 going live Impact Comment: Changes to Asset Register, Changes to Field Commissioning and On Site Testing Procedures, Changes to Meter Procurement Requirements, Field and Office Support Training. Other Comments: We believe that another revision is required, in order to correct the anomalies and technical issues detailed below.	✓	180
Association of Meter Operators	-	Neutral Comment: AMO members have responded directly. The AMO is keen to see the document completed and implemented to resolve issues identified in the current operational version.	-	-
EDF Energy, Supply	-	Impact Comment: We do not think that this change will require system changes but could require some changes to current processes of field operations. Implementation Comment: Further investigation of possible impact required to determine if changes are required as noted.	✓	60
UDMS	-	-	X	-
Gemserv	-	Neutral Comment: No impact on MRA products	X	-
British Energy Power & Energy Trading Ltd BCA: Jonathan Perks	-	Neutral Comment: Please see comments in redline table below.	✓	-

E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy Power	-	-	X	-
---	---	---	---	---

Comments on redline text

No.	Organisation	Section	Comment
1	Western Power Distribution	Document name COP4 Issue 5 v4.5 Page 9 – penultimate bullet point	MOCOPA is now version 2.3 dated 4th April 2007
2	Western Power Distribution	Document name COP4 Issue 5 v4.5 Page 9	Suggest that "Statutory Instrument 1998 No 1566 The Meters (Certification) Regulations 1998" be added to the list of reference documents.
3	Western Power Distribution	Document name COP4 Issue 5 v4.5 Page 13 – 5 Half Hourly Metering Systems	Add a clause after the first paragraph. "Within this document, any alpha Code of Practice Metering System shall be treated as if it were the equivalent numeric Code of Practice Metering System."
4	Western Power Distribution	Document name COP4	"A Type A Calibration shall be carried out to the relevant product standard.

		Issue 5 v4.5 Page 14 – 5.1.2.1 Type A calibration	<p>In most cases it is the manufacturer who will carry out Type A Calibration and deliver the Meter with a Certificate indicating conformity with the accuracy requirements appropriate to the Meter's Class (that is, according to the relevant product standard BS EN 62053-21 (Active static Meters of Classes 1 and 2), 62053-22 (Active static Meters of Classes 0.2S and 0.5S) or 62053-23 (Reactive static Meters of Classes 2 and 3)). Such Certificates shall for the purposes of this CoP4 be referred to as a Type A Calibration Certificate."</p> <p>The above does not require the meter to be tested at the specific test points in Appendix B. (It is "hidden" in the next sentence).</p> <p>Amend the first sentence to read:</p> <p>"A Type A Calibration shall be carried out to the relevant product standard with tests at the load points specified in Appendix B."</p>
5	Western Power Distribution	Document name COP4 Issue 5 v4.5 Page 16 - 5.1.4.1 Calibration Certificates	<p>The review group recognised that there has been a problem with TA audits in that a Certificate of Conformance alone or a test sheet alone was not deemed sufficient. The words have been changed to now accept either. However, should this be for "existing" only or existing and future installations? Will a "new" site fail an audit if it has a Certificate of Conformance, but no test results for the test points stipulated in App B?</p> <p>The new COP does specifically require statement of measurement uncertainty for new sites, but not the measurements themselves!</p>
6	Western Power Distribution	Document name COP4 Issue 5 v4.5 Page 16 – 5.1.4.1 3 rd paragraph	<p>For existing Type A Calibration Certificates pre-dating Issue 5, Version 4.5 of CoP4, .." All certificates will be existing!</p>

7	Western Power Distribution	Document name COP4 Issue 5 v4.5 Page 18 5.2 Sample Calibrations 5 th paragraph	" .. ,together with the number of Meters that were found to be outside of prescribed limits (and their measured accuracies)" I believe it was the view of the group, and as included in note 12 (Appendix E), the measured accuracies only need reporting for those that are outside limits. For clarity: " .. ,together with the number of Meters that were found to be outside of prescribed limits (and the measured accuracy of each of those found outside prescribed limits)"
8	Western Power Distribution	Document name COP4 Issue 5 v4.5 Page 21 – 5.5.3 Sealing	"At the completion of Commissioning, Metering Equipment shall be sealed in accordance with the requirements of BSCP 06 and BSCP 514 as appropriate."
9	Western Power Distribution	Document name COP4 Issue 5 v4.5 Page 26 – 8.1.1.1	Delete paragraph number (8.1.1.1) as this one clause applies to 8.1.1
10	Western Power Distribution	Document name COP4 Issue 5 v4.5 Page 26 – 8.2	This relates to Reference standards so belongs to 8.1. Renumber as 8.1.2 (as per version 4.4)
11	Western Power Distribution	Document name COP4 Issue 5	This does not relate to Reference Standards but CTs and VTs so renumber this to 8.3. and the three sentences to 8.3.1 - 8.3.3.

		v4.5 Page 26 - 8.2.2	
12	Western Power Distribution	Document name COP4 Issue 5 v4.5 Appendix B – 1 st & 2 nd paras	<p>“Meter Calibrations should be performed at the test points (values of currents) indicated in the following tables. The measured errors at these test points should not exceed the percentage error limits stated in the tables in Appendix C. Where a test point is outside the range of the value of current given in the relevant table in Appendix C, the percentage error limit shall be taken from the percentage error limit from the value of current closest to the test point value.</p> <p>For example, a test point of $0.01I_n$ (rated current) at unity Power Factor for Type A Calibration for Class 1 Meter will have an associated percentage error limit of +/- 1.5% (taken from Table C1, $0.02 I_n \leq I < 0.05 I_n$).”</p> <p>This would be clearer if the “For example were part of the same paragraph as what it is referring to:</p> <p>“Meter Calibrations should be performed at the test points (values of currents) indicated in the following tables. The measured errors at these test points should not exceed the percentage error limits stated in the tables in Appendix C.</p> <p>Where a test point is outside the range of the value of current given in the relevant table in Appendix C, the percentage error limit shall be taken from the percentage error limit from the value of current closest to the test point value. For example, a test point of $0.01I_n$ (rated current) at unity Power Factor for Type A Calibration for Class 1 Meter will have an associated percentage error limit of +/- 1.5% (taken from Table C1, $0.02 I_n \leq I < 0.05 I_n$).”</p>
13	Western Power Distribution	Document name COP4 Issue 5 v4.5 Appendix B	<p>“It should be noted that I_n refers to the rated current of a transformer operated Meter and I_b refers to the basic current of a whole current Meter.”</p> <p>Use the same words as in Appendix C for consistency</p>

		3 rd Paragraph	"It should be note that I_b refers to basic current of a whole current Meter, I_n to the rated current of a transformer operated Meter and I_{max} to the maximum current rating of a Meter."
14	Western Power Distribution	Document name COP4 Issue 5 v4.5 Tables B1, B2, B3, B4, B5	Change I_m to I_{max} for consistency (as per above)
15	Western Power Distribution	Document name COP4 Issue 5 v4.5 Table B2	"1.0 I_n Export~" test point missing, but it has been added to B1.
16	Western Power Distribution	Document name COP4 Issue 5 v4.5 Table B3	"These tests shall be carried out for Import/Export directions, as registered with the CDCA or SMRS for a given metering point. If the same measurement element is used for both Import and Export one additional test only (at 1.0In UPF balanced) is required in the reverse direction." (I use "reverse" rather than Export here as some predominantly Export sites may also be required to record small Import)
17	Western Power Distribution	Document name COP4 Issue 5 v4.5 Table B3 and B4	If the SI 1566 test points are to be retained in the other tables (for indication), these need identifying in the tables B3 and B4 for completeness. (X(1) and X(3) only both tables).
18	Western Power Distribution	Document name COP4 Issue 5	I do not think tests are required in both directions unless the metering is being used for both, in which case the word for B3, above apply. If it is to be tested in both directions, regardless, then it needs the extra test "1.0 In

		v4.5 Table B4	Export~" adding and the note modifying: "~Bi-directional Meters shall have the tests performed for both Import and Export unless the same measurement element is used for both Import and Export in which case one test only is required. X= all elements combined"
19	Western Power Distribution	Document name COP4 Issue 5 v4.5 Table B5	The last test point should be "1.0 I _b /I _n Export~" and not "1.0 I _m "
20	Western Power Distribution	Document name COP4 Issue 5 v4.5 Table B5	Add to notes "X= all elements combined"
21	Western Power Distribution	Document name COP4 Issue 5 v4.5 Appendix E - tables E1/E2	Half of each table is missing!
22	Western Power Distribution	Document name COP4 Issue 5 v4.5 Appendix E2	Typo- "Number of Meters Outside CoP4 limits 12 ¹² "
23	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited,	CoP4 13	Section 5.1.1 Types of calibration. Final sentence of final paragraph on page. Sentence should read "In all other cases (save where the type A calibration was carried out

	Npower Yorkshire Supply Limited, Npower Direct Limited		on a compensated meter) the meter shall be re-Calibrated....."
24	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	CoP4 17	Section 5.1.4.2 Annual calibration report. Should these figures include the Type B Calibrations carried out as sample calibrations?
25	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	CoP4 18	Sample calibrations. The second to last paragraph. Information that is not asked for in table E2 is referenced. The timescales since the Meter underwent a Type A Calibration and (and their measured accuracies) are not required in table E2.
26	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	CoP4 27	The 3rd paragraph after the table says "For reactive CoP1 and CoP2 Meters, the intervals between Calibrations are twice those for Active CoP1 and CoP2 Meters." No guidance is given for CoP2 circuits (where no check reactive meter is required) should the MOA chose to go down the Type B Calibration route. We believe the main meters should undergo a Type B calibration every 10 years in this instance.
27	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	CoP4 29,30,32	Tables B1, B2, B3, B4 and B5 in appendix B are based on circuit code of practice whilst the accuracy tables for meters in appendix C are based on class of the meter. As appendix B refers to testing of Meters it would seem logical for the tables to be based on class of meter (to line up with appendix C) rather than circuit code of practice.
28	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	CoP4 38	Table E2 The words in section 5.2 specify that "A sample calibration will involve the undertaking of a Type B Calibration'. So there should be no requirement for columns 4 and 6 in table E2 as all the Calibrations should be Type B Calibrations.
29	ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd.	CoP4 5.1.4.2 Pp17	4th line of paragraph. The phrase "third parties". A clarification of what constitutes a third party may be useful.

	SP Distribution Ltd		
30	ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd	CoP4 5.1.4.2 Pp17	On last line of paragraph replace "may" with "made"
31	ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd	CoP4 5.3.3 Pp19	Second paragraph on 5th and 6th line it uses the phrase "time to time". This is very woolly and should be replaced with a more useful, definite phrase.
32	Siemens Energy Services	CoP4 Page 2 – Main Heading	The Main heading in capital letters does not match the title of the Code of Practice on the front page. The front page is correct, the heading needs to change and reflect the front page. The front page wording is also correctly reflected in the "Forward"
33	Siemens Energy Services	CoP4 Page 13 – Para 5.1.1 – Types of Calibration	A Type A Calibration is an initial Calibration carried out under reference conditions prior to installation. What are the "Reference Conditions"? There is no definition. As there are definitions for "Reference Standard" and "Reference Temperature" a definition for "Reference Conditions" is required. As meter manufacturers will carry out this test it has particular significance. Without a definition there may be different interpretations of the meaning of this paragraph. To avoid doubt and confusion a definition is required.
34	Siemens Energy Services	CoP4 Page 16 – Para 5.1.3 – Sealing	Because a "Paper Seal" is specifically mentioned, this paragraph seems to assume that manufacturers and test houses will use a paper seal as a calibration seal by preference. While paper seals are perfectly acceptable there are an equal number of plastic seals, lead seals and copper seals. Without minor additions to the wording the inference is that non-paper seals are non-compliant.
35	Siemens Energy Services	CoP4 Page 18 – Para 5.2 – Sample Calibrations	"The Meter Operator Agent shall sample at least 1% of each meter type". Clarification is required to make it clear what population is being sampled at a rate of 1%. Is it the Total Installed Population of a meter type or is it just the population that the Meter Operator Agent is responsible for? If the 1% refers to the Meter Operator Agent then what happens if less than 100 meters of this type are installed? What is the minimum number required for

			sampling in this instance?
36	Siemens Energy Services	CoP4 Page 25 – Para 8 – Calibration Equipment for Measureme nt Transforme rs	Paragraph ii) refers to Section 7.1 – 7.3. As section 7 is about the calibration equipment for meters is it correct that calibration equipment for Measurement Transformers follows exactly the same criteria? Should the reference be to Section 8.1 – 8.3?
37	Siemens Energy Services	CoP4 Page 36 – Appendix D – Measureme nt Uncertainty	At the review meeting held on the 27 July I understand that it was agreed to include a list of all components that go into making up an uncertainty basket. The components look as though they are missing from the Code of Practice. It is suggested that this list be included, so as to avoid any doubt as to the components that need to be included when calculating the "Maximum Overall Uncertainty of the Calibration Equipment". This is a required calculation for comparison with the acceptable limits in Tables D1 – D4.
38	British Energy Power & Energy Trading Ltd	CoP4	<p><u>CoP 4 Issue 5 V4.5 Review</u></p> <p>General</p> <ol style="list-style-type: none"> Appendix F has been removed for inclusion in a separate guidance document. It was agreed at the 07/08/07 CoP4 Review Meeting that this would be issued for industry review and made available for reference on the same timescale as CoP4. Please confirm draft guidance note issue date. "Type A/B/C Calibrations" are written throughout the document with both upper and lower case "T". These should all be consistent. In the last Amendment Record entry, the date should read 04/09/07 <p>Section 1 - Scope</p> <ol style="list-style-type: none"> Given the 07/08/07 CoP4 Review Meeting agreed all relevant text would be amended to clearly distinguish between Metering Equipment ordered before and after

		<p>implementation of the new CoP4, the example given in footnote 2 would not require a dispensation. It should only be retained (or possibly added to the guidance document), if a valid example is described.</p> <p>2. The relevance of (Technical Assurance procedure) BSCP27 to Paragraph 6 is not understood. The only reference in BSCP27 to queries and disputes relate to BSCP11. Is it appropriate for a CoP to deal with disputes between BSC Parties?</p> <p>Section 3 - References</p> <p>1. The document text no longer refers to MOCOPA. This should be deleted.</p> <p>2. Tables B1 and B2 include references to Statutory Instrument (SI) 1566. This should be added to Section 3.</p> <p>3. Assuming it is relevant (see Section 1 comment 2 above), BSCP27 (or BSCP11, or a more appropriate replacement) should be added to Section 3.</p> <p>Section 4 – Definitions and Interpretations</p> <p>1. 4.20(a) should include Calibration/test “dates” as an essential element of Traceability</p> <p>2. 4.21 : “Transfer Standard means Standard...” should read “Transfer Standard means a Standard...”</p> <p>Section 5.1.1 – Types of Calibration</p> <p>1. In Para 4, the list of Tables relevant to PARh meters is incomplete. It should include A1, B1 and B3</p> <p>2. As written Para 5 only allows the quality-assured application of software-based compensation for Blank Calibrated meters and all other meters have to be Type C Calibrated. Surely if there is confidence in the quality-assured process for Blank Calibrated meters, it should apply to all software-based compensations. If not, the requirement for Type C Calibrations should apply every time.</p> <p>Section 5.1.2 – Meter Calibration Criteria</p> <p>1. In Para 1, “installed” should read “ordered”</p> <p>2. In 5.1.2.1 Para 3, reference is made to the confirmation of pulse output to be made for “at least one load point”. Given that BSC settlement is wholly dependent on the accuracy of pulsed output, shouldn’t a revised CoP4 rectify this serious long-term anomaly by using pulsed output either in place of or as well as metrological test output as the primary test</p>
--	--	---

		<p>parameter? Ditto for type B and C Calibrations?</p> <ol style="list-style-type: none"> 3. In 5.1.2.4 Para 1, "periodic calibrations" should read "periodic Calibrations" 4. In 5.1.2.4 Para 2, "type of Meter" should be amended to use the "Meter Type" per 4.12 5. In 5.1.2.5 Para 1, "...last calibration is an initial calibration..." should read "...last Calibration is an initial Calibration..." <p>Section 5.1.3 – Sealing</p> <p>Unless the term "paper seal" will be always understood by all BSC Parties and the meter supply industry as a security seal, it is suggested this be amended to read either "indicative paper seal" or "tamper-evident paper seal".</p> <p>Section 5.1.4 – Records</p> <ol style="list-style-type: none"> 1. Given section 5.1 concerns Meters, references in 5.1.4.1 Para 1 and Para 5 to "Metering Equipment" should be amended to read "Meters". Also, "installed" should read "ordered". 2. In 5.1.4.1 Para 2, "type of Meter" should be amended to use the "Meter Type" per 4.12 3. As both references in 5.1.4.1 Para 6 to standards are unrelated to the defined term in 4.18, they should both have a lower case "s". 4. For consistency with 5.1.4.1 Para 8, the wording in Para 10 should refer to Codes of Practice 3, 5, 6 & 7. 5. Paragraph 1 of 5.1.4.2 from the previous issue has been deleted. This valuable description of test result deviations from "normal distributions" was not discussed or agreed at the 07/08/07 CoP4 Review Meeting. Please either reinstate this text or justify its removal. 6. In the current 5.1.4.2 text, the words "...is given in Appendix E." should more accurately read "...is given in Table E1 of Appendix E.". Also, "...report shall be may available..." should read "...report shall be made available..." 7. Footnote 4 should read "Where certificates are not available, refer to Section 5.1.4.1." The reference to 5.3.3 is not relevant here as 5.1.4.3 only relates to Meters. 8. As per comment 4 above, the wording of Para 2 of 5.1.4.3 should refer to Codes of Practice 3, 5, 6 & 7.
--	--	---

		<p>Section 5.2 – Sample Calibrations</p> <ol style="list-style-type: none"> 1. As has been previously stated on a number of occasions, BE objects strongly to the wording of Paragraph 4. BE believe this is an unjustified retrograde step which could result in too little information being provided too late if there are problems in the future with (possibly thousands of installed) “rogue” meters. Accordingly, BE again requests this matter be re-considered. 2. The wording in Para 5 no longer reflects changes to table E2 agreed at the 07/08/07 CoP4 Review Meeting. It is suggested this should now read : “The MOA shall provide an annual report to BSCCo on the Meters Calibrated. This annual report shall contain information on the number of Meters sampled per Meter Type, and the number of Meters that were found to be outside of prescribed limits. The format of this annual report is contained in table E2 of Appendix E. The BSCCo shall collate and report the findings to the Panel. It should be noted that certain elements of information provided in this annual report may be distributed to third parties in a non-confidential manner. However a fully disclosed version shall be made available to the Panel.” 3. As agreed at the 07/08/07 CoP4 Review Meeting, an additional 5.2 paragraph is required along the lines of : “Where periodic Calibrations exceed stated sample Calibration rates, separate sample Calibrations are not required.” <p>Section 5.3 – Measurement Transformers</p> <ol style="list-style-type: none"> 1. For clarity, the start of 5.3.1 Para 4 sentence 1 should read “Certificates produced for measurement transformers ordered after the effective date....” 2. For clarity, the text in 5.3.3 Para 1 sentence 1 “...Traceable Certificates and for Certificates produced after...”should read “...Traceable Certificates. Certificates produced for measurement transformers ordered after....” 3. The end of 5.3.3 Para 1 refers to the use of either single or multiple measurement uncertainties “as appropriate”. Please clarify the criteria to be used to determine this. 4. In sentence 1 of 5.3.3 Para 2, “installed” should read “ordered” 5. In 5.3.3 Para 3, “5.1.4.3-5.1.4.5” should read “5.1.4.3 and 5.1.4.4” <p>Section 5.4 – Voltage failure alarm</p> <p>For the avoidance of any doubt, “as appropriate” in Para 2 should read “and-re-checked”.</p>
--	--	--

		<p>Section 5.5 – Commissioning</p> <ol style="list-style-type: none"> 1. In 5.5.1 Para 1, “traceable” should read “Traceable”. Also, as it is already covered by the defined term 4.20, the bracketed reference to serial number should be deleted. 2. The 5.5.1 Para 2 text reference to maximum Calibration periods of 2 years is double those stated for Standards in 7.2.2/7.3.2. Please confirm this is correct. 3. The 5.5.2 list of Commissioning tests should include : <ul style="list-style-type: none"> • The meters are set to the same current transformer and voltage transformer ratios as the installed measurement transformers • Metering Equipment detects phase failure and operates the required alarms 4. In 5.5.4 Para 1, “traceable” should read “Traceable”. <p>Section 6 – Non Half Hourly Metering Systems</p> <ol style="list-style-type: none"> 1. In Para 1 of 6.1, “...tests and checks are provided to Commissioning engineers to...” should read “...tests and checks are provided for Commissioning engineers to...” 2. Para 3 of 6.1 should be deleted as this requirement is already covered by 6.2. 3. The second bullet point only applies if NHH systems are ever installed on multi phase circuits. Please confirm this is the case. If not, it should be deleted. 4. There are no references in CoP 8 or 9 to voltage transformers. Accordingly, on the third bullet point, providing there are burdens on NHH current transformer circuits, “measurement” should read “current”. If not, this bullet point should be deleted. 5. Under Footnote 6, “commissioning” should read “Commissioning”. <p>Section 7 – Calibration Equipment for Meters</p> <ol style="list-style-type: none"> 1. In Para 1, “Standards” is not used in the context defined by 4.18 and should read “standards”. 2. In the final Para, “...to a standard used...” should read “...to a Standard used...”. 3. Footnote 7 makes the first and only reference to the Guidance document discussed at the 07/08/07 CoP4 Review Meeting. Please ensure (i) this is included in Section 3, and (ii) similar references are added against other topics which will be covered by this document (e.g. overall accuracy calculations, uncertainty budgets, justifications for extensions of Standard calibrations, etc.)
--	--	--

		<p>4. Given Section 7 only covers Calibration equipment for Meters, the wording of 7.4.1 should read "All Certificates for new Calibration equipment must be produced using verifiable Standards." Also, footnote 8 is not relevant and should be deleted.</p> <p>Section 8 – Calibration Equipment for Measurement Transformers</p> <p>1. General : As written this section is confusing because it appears to be covering separate requirements for (i) measurement transformer test equipment and (ii) Standard current and voltage transformers. Given the title, the text throughout this section should only be relevant to the former (i.e. the equivalent of Section 7 for Meters). It is suggested the latter should be a subset of 5.3.</p> <p>2. In Para 1, "calibrate" and "traceability" should be capitalised</p> <p>3. In Para 2, "Metering Equipment" should read "measurement transformers".</p> <p>4. In 8.1.1.1, "reference" should read "Reference" per 4.16.</p> <p>5. 8.2.1 : Should there be references to Transfer and Working Standards?</p> <p>6. It is suggested Records (8.2.2) should not be a subset of Calibration Intervals (8.2) but should be numbered as 8.3, 8.3.1, 8.3.2 etc. The Index will need updating accordingly.</p> <p>7. If section 8.2.3 is still valid (see comment 1 above), "measurement transformers" should read "measurement transformer Calibration equipment". Also, check relevance of footnote 9 bearing in mind test equipment, measurement transformers and Standards are not registered.</p> <p>8. Please clarify current section 8.2.4, bearing in mind comment 1 above</p> <p>9. If section 8.2.5 is still valid (see comment 1 above), a clear distinction should be made between equipment ordered before and after implementation of the revised CoP4.</p> <p>Appendix A – Calibration Period Table</p> <p>1. In Para 1, "program" should read "programme".</p> <p>2. For clarity, it is suggested Para 5 be deleted and Para 6 be amended to read "For reactive CoP3 and CoP5 Meters and Phase Advanced Reactive (PARh) Meters, the interval...". Also see related comments against Appendices B, C and D.</p> <p>Appendix B – Test Points</p> <p>1. Please provide definitions for subscript "m" and bracketed appearances of "a" and "b". Please also explain whether "X,Y" means "X or Y" or "X and Y".</p>
--	--	--

		<p>2. In Table B1, the previous overload currents covered 120, 150 and 200%. Why has 1.0Im been added and how would this differ from 1.0In?</p> <p>3. Why has the new final row been added to Table B1? This was not discussed at the 07/08/07 CoP4 Review Meeting. Previously, the note regarding bi-directional meters applied to all test points (i.e. at different load currents and power factors). The new one for export only relates to 100% current at unity power factor. Please clarify.</p> <p>4. The middle row in Table B2 previously covered 20% current. Please explain why this has now been replaced by 1.0Ib/In. Also, why have active meters on this row changed from “#” to “X,Y”?</p> <p>5. Each Table B2 test point was previously shown by “#” (each element on its own). They are all now shown by “X” (all elements combined). Please explain.</p> <p>6. Under Table B2 Notes, “X” should refer to “elements”, not “element” as written.</p> <p>7. Against “**” in the Notes for Table B3, “Im” should read “1.0Im”</p> <p>8. New Item 3 under Table B3 Calibrations for CoPs 3, 5, 6 & 7 is inconsistent with the penultimate Para of Appendix A. Please clarify.</p> <p>9. It is noted that no numbers (or letters) in brackets are shown for X and Y test points in Table B4. Please clarify.</p> <p>10. Previously Table B4 showed two zero power factor test points “@” and “#” for reactive meters at 100% current. This has now been replaced by one “X”. Please clarify.</p> <p>11. Table B2 comments 4 and 5 above, also apply to Table B5. Also, on Table B5, should the middle row for active meters at 0.5 inductive power factor also have test point “X(4)”?</p> <p>12. Appropriate notes need to be added to indicate which Appendix B Tables apply to Type A, B and C Calibrations for PARh meters.</p> <p>Appendix C – Measured Errors</p> <p>1. Please amend Para 3 text to define which Appendix C Tables measured error limits for Type A, B and C Calibrations apply to PARh meters.</p> <p>2. For consistency with Appendix B, headings “Accuracy Table for Active Meters” and “Accuracy Table for Reactive Meters” should be numbered 1 and 2 respectively.</p> <p>3. For consistency with Appendix B, Table C1 and C2 should be reversed.</p> <p>4. In the heading for Table C1, “Class 2 (CoP 5)” should read “Class 2 (CoP 5, 6 & 7)”</p>
--	--	---

		<p>5. As presented for review, Table C2 is split across 2 pages. Please ensure on the formal issue Tables appear in full on one page only.</p> <p>6. I_{max} accuracy limits at unity power factor for CoP1 & 2 active meters at 1.2In, 1.5In and 2.0In (per Table B1) are not shown in Table C2. Please clarify.</p> <p>7. Table C3 Rows 1, 3 and 5 do not appear to correspond with any related Appendix B tables. If this is indeed the case, it is suggested they should not appear here (unless they are relevant to whole current meters – in which case related upper and lower current limits for transformer operated meters should be deleted).</p> <p>8. Unlike Appendix B reactive meter tables which refer to power factor as 0.866 inductive and capacitive, they are defined in Table C3 as 0.5 inductive or capacitive. Assuming these are the same they should be expressed in the same way to avoid confusion. If they are different, one or both will need to be amended to achieve a like-for-like match.</p> <p>9. I_{max} accuracy limits at unity power factor for CoP1 & 2 reactive meters at 1.2In, 1.5In and 2.0In (per Table B1) are not shown in Table C3. Please clarify.</p> <p>Appendix D – Measurement Uncertainty</p> <p>1. Please relocate Para 1 above the heading for Table D1 and amend text to read “Measurement uncertainty for Phase Advanced Reactive (PARh) Meters shall be as per reactive Class 2 Meters as per Tables D3 and D4.”</p> <p>2. In Table D1, Class “0.2” should be amended to read “0.2S”.</p> <p>3. “meters” in the Table D2 heading should read “Meters”. Class “0.2” should read “0.2S”.</p> <p>4. Table D1 and D2 do not cover measurement uncertainties for Class 0.5S Meters (Table D1 footnote “2” only covers Type A and C Calibrations at unity power factor). Do limits for Class 0.5 also cover 0.5S? Please clarify.</p> <p>5. The limits in Table D2 for Class 1 and 2 Meters are the same at unity power factor as they are at other than unity. This is not the case for 0.2S or 0.5 Meters in D2 or for any Classes of Meter in Table D1. Please check source and confirm.</p> <p>6. Table D4 should include limits for Class 2.0 and 3.0 for measurements other than unity power factor (per Appendix B test points).</p> <p>Appendix E – Annual Report Format</p> <p>1. Appendix E1 and E2 in the .pdf format review document appears to have been</p>
--	--	---

			<p>incorrectly scanned. As a result these report formats cannot be seen in full. Missing portions have not been reviewed. Please rectify.</p> <ol style="list-style-type: none">2. Appendix E1 : Page 37 header, footer and Page number are missing.3. Appendix E1 Footnote 13 : This appears to imply bi-directional meters do not have to be tested for both import and export if energy flow on installed circuit is always in the same direction. Please confirm.4. Section 5.2 states sampling is only done as Type B Calibrations. If so, the 2 Type C columns should be deleted from Appendix E2.
--	--	--	--

DCP0013 - AFYC Recalculation

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓	-	-	-
EDF Energy, Supply	✓	-	X	0
ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd	✓	Implementation Comment: Document Changes Other Comments: Re footnote – This change may also be an opportune time to align the BSC and the ISRS Technical Specification	✓	30
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;	✓	-	X	0

British Energy Direct Ltd	✓	-	X	0
E.ON UK Energy Services Limited	-	Neutral Comment: This change will have no direct impact on our systems & processes	X	-
Siemens Energy Services	-	-	-	-
UDMS	-	-	X	-
Gemserv	-	Neutral Comment: No impact on MRA products	X	-
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy Power	-	-	X	-

DCP0014 - Review of D0215 'Provision of Site Technical Details' and surrounding processes

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓	<p>We support this proposal in principle, and support the notion of receiving early notification of site details from the LDSO. We are particularly supportive of the second initiative for the LDSO to update the MOA once they have more site information. However, we believe this change will only really be beneficial if the current usage and quality of the information in the D0215 is improved. We would also like some clarification on the expected actions of the MOA and Supplier (if any) on receipt of an early (unsolicited) D0215. Is the MOA expected to confirm the accuracy of the meter, or change the meter, etc.? Additionally the CP allows the MOA to send a D170 to the LDSO "after the appointment date" which we believe may need to be more specific, or is it intended that the MOA can send a D170 "anytime after the appointment date" - we believe it would be beneficial to the MOA to receive the information as soon as possible.</p> <p>We would also like to see this scenario being added to BSCP514 as there is no mention of this in the CP.</p> <p>Also, it was felt that some of the information contained in the flow, in particular the free text Meter Equipment/Service Location is particularly useful, and would ask whether this field could be made mandatory; therefore we would welcome further discussion about mandating the Meter Equipment/Service Location (J1025).</p>	-	-
E.ON UK Energy Services Limited	✓	Impact Comment: Changes will be required to our systems in order to process the D0215s correctly.	✓	-
Association of Meter Operators	✓	<p>Agree Change Comment: The AMO are keen to see this DCP turn into a CP as discussed at various meetings to date.</p> <p>The AMO (and other members of meetings) have already expressed that they would be keen to review the drafting of CP prior to issue to participants, to ensure it can be progressed quickly without incremental</p>	-	-

		versions		
EDF Energy, Supply	✓	Implementation Comment: For code changes to be made and processes updated.	✓	90
UDMS	✓	-	X	-
British Energy Direct Ltd	✓	Impact Comment: There will be an impact on our systems and processes.	✓	90
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy Power	✓	-	✓	-
Western Power Distribution	X	<p>1. A new requirement to send the D0215 if we receive a D0170 request from a meter operator on a change of agent.</p> <p>WPD has only recently implemented the capture of site technical details for new MPANs in a manner which allows automated responses to D0170s received as part of a new connection scenario. If the change is implemented then we will be inundated with D0170s for MPANs that were created at market start-up and any time since as MOAs will no doubt configure their systems to send the flow on every CoA. We do not hold data in a form that will allow us to respond to these automatically and could not cope with them manually due to the anticipated volume.</p> <p>We could accept the change if it only applied to MPANs created on or after the date the change is implemented as this would mean we do not have to back-populate our site technical details database for all existing MPANs. If we had to back-populate we estimate it would take around 3 man-years of effort.</p> <p>2. A new requirement to automatically send the D0215 to the MOA and Supplier if we make a change to the site technical details.</p> <p>We will need to make significant system changes to implement this change. Although I agree with the sentiments of the change proposal I</p>	✓	6 – 18 months

		<p>am not sure the solution has been properly defined. For instance, there is nothing in the current data flow that would let us notify the recipients what had changed and on what date it had changed.</p> <p>As there are other possible D0215 changes in the pipeline we would not want to make system changes at this time. We would prefer to see the issues around the D0215 fully identified and resolved so that we only need to make one set of system changes.</p>		
<p>ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd</p>	X	<p>Disagree Change Comment: Though we support the principle of allowing greater communication between agents we feel that the DCP as it stands is not fit to go forward as a CP.</p> <p>Issue 3: The change of MOA is already contained within BSCP514 for both HH (5.2.1) and NHH (6.2.1) trading. It does not make sense to include this process within BSCP515. There is no reason why the change cannot be made to these sections. We do not support a change to BSCP515</p> <p>Issue4: Again, changes to metering equipment is contained within BSCP514 and as such any changes should be made to BSCP514 and not to BSCP515 where this change would be wholly inappropriate.</p> <p>We believe that any duplication between the BSCPs does not give clarity or robustness to the process and the BCP should be re-considered before being progressed.</p> <p>Impact Comment: If this were to go ahead we will require changes to systems and new business processes to be followed.</p> <p>Other Comments: Though we agree with the principle of allowing greater communication between parties we do not agree with the method suggested within this BCP.</p>	✓	270
<p>Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd;</p>	X	<p>We recognise that D0215 has data items that are not included in the D0268 that the MOP would send to the supplier on receipt of the D0215. However, are these data items critical to the supplier or would the D0268 be sufficient as this would avoid LDSO sending a duplicate flow to Supplier as well? If this comments are accepted then we would accept this proposal.</p>	✓	-

Medway Power Ltd;				
IMServ Europe	X	<p>Impact Comment: This CP is expected to require software changes to process a changed D0215 flow structure</p> <p>Implementation Comment: Wheatley MOP application requires change to be agreed by the consortium.</p> <p>Other Comments: Where a D0215 sent by the LDSO is received as an unsolicited flow by the MOA, then it is necessary for the MOA to discern when the change was made in relation to latest MTD held by the MOA – This is not possible as the D0215 does not hold an MSMTD.</p> <p>Should the LDSO have the need to change the metering on site – how would the MOA be informed? If this information is to be provided (as installed and removed meters) then change would be required to the D0215 with relevant system changes to receive and process the flow.</p>	✓	c.365
Siemens Energy Services	-	-	-	-
Gemserv	-	<p>Impact Comment: Impact on the E2E diagrams</p> <p>Other Comments: Changes to the E2E diagrams would be required to reflect the changes to the BSCP processes. The lead time to implement any changes would be approximately 2 months. This would include designing the changes to the E2E diagrams and drafting the change proposal, to MDB approval and implementation. However, changes to the E2E diagrams are only implemented in line with our release strategy (releases in February, June and November).</p>	✓	2 months

DCP0015 - CRA Service Description Re-write

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
EDF Energy, Supply	✓	-	X	0
ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd	✓	-	X	0
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;	✓	-	X	0
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	-	-	-	-

E.ON UK Energy Services Limited	-	Neutral Comment: This change will have no direct impact on our systems & processes.	X	-
Siemens Energy Services	-	-	-	-
UDMS	-	-	No	-
Gemserv	-	Neutral Comment: No impact on MRA products	X	-
British Energy Power & Energy Trading Ltd	-	-	X	-
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy Power	-	-	X	-

CP1192 v2.0 - Changes to the Investigate Inconsistencies processes in BSCP502 and BSCP514 (Half Hourly only)

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
SSIL	✓	-	X	0
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓	-	-	-
ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd	✓	Impact Comment: System changes will be required to deliver compliance within this area. Other Comments: The CP implementation date still indicates February 2008 as the release date, however the CP also states that the CP requires a minimum of 6 months notice between approval and implementation. If this is the case then the February 2008 date is no longer practical and therefore the CP requires a change to a later implementation date.	✓	180
Siemens Energy Services	✓	Impact Comment: This would impact our Organisation's processes.	✓	90
UDMS	✓	The use of Fault resolution plan should be limited to complex situation in order to ensure that in the majority of cases, the D0005 flow contains all the required information therefore creating a valid electronic audit trail and limit non DTC interactions.	✓	60
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE	✓	-	X	0

<p>Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;</p>				
<p>IMServ Europe</p>	<p>✓</p>	<p>Agree Change Comment: <u>Conditional</u> on the addition of further clarification regarding the use of the newly introduced "Fault Resolution Report".</p> <p>We accept that there may be instances when the MOP needs to send additional information to the Data Collector regarding an outstanding fault however this should be restricted solely to instances in which the information exceeds the permitted "data field length" of the D0005. In such an instance it should be mandatory for the MOP to still return a D0005, in which they note the fact that a "Fault Resolution Report" has been sent. This process will ensure that the DC is aware that a manual process has been invoked and will provide them with the prompt to "seek out" the necessary information. If such controls are not implemented there is a very high risk of information being lost resulting in unnecessary chasing for updates as is the current problem.</p> <p>We believe that the red-lined BSCPs could be further amended to reflect this requirement without compromising the progression of the CP as, this does not entail a process change/addition, merely clarification of the instance and methods of use.</p> <p>In addition to this, DCs will need to publish contact points (generic email addresses) for the use by MOPs in sending such information. Consideration should be given as to whether this should be referenced within the Industry Documentation and whether this information should be stored on the ELEXON website.</p> <p>Impact Comment: An automated solution was introduced for the MOP role in preparation for this change, but would require rework to comply fully with this CP making the Feb 2008 date unrealistic.</p> <p>The process as described potentially calls for more than 2 D0005's to be sent. If this is a mandatory process then the Wheatley MOP application requires amendment as it only allows for the tracking of two D0005's prior to sending a D0002 on fault resolution however the change could</p>	<p>✓</p>	<p>c.360</p>

		be deployed ahead of this development.		
British Energy Direct Ltd	✓	Impact Comment: A review of our processes would be necessary.	✓	30
Western Power Distribution	✓	-	✓	-
E.ON UK Energy Services Limited	X	Disagree Change Comment: We continue to object to the implementation of this CP due to the distortion it will have on the HM01 PARMS serial. Currently once a HHMO has exhausted reasonable efforts to fulfil a request for a meter investigation without being able to carry out the investigation due to 3rd party issues they will transmit a D002 requesting further instructions. It is this period between the receipt of a D0001 and the transmission of a D0002 that is recorded as the time taken to resolve a meter fault. The proposed change would extend the recorded interval in those cases where the resolution was beyond the control of the HHMOA. In the response to our original comments it was stated "that the purpose of the PARMS standard is to track Fault resolution at the industry level". We have some difficulty in reconciling this statement with other items such as the BSC Audit Approach and the agent performance data, including HM01, that will be included in the Market operations Report (MOR) supplied to PAB from October onwards. Impact Comment: Changes to LWPs will be required	✓	-
EDF Energy, Supply	X	Disagree Change Comment: We are not convinced that this will resolve issues in this area as flows used in this process are used for too many different scenarios and open to different interpretations. Implementation Comment: Mainly for process changes.	✓	90
Association of Meter Operators	-	Neutral Comment: The AMO members will respond directly, but they are keen to ensure the processes are unambiguous, which this CP is intended to achieve	-	-
Gemserv	-	Impact Comment: Impact on E2E diagrams Other Comments: Changes to the E2E diagrams would be required to reflect the changes to the BSCP processes. The lead time to implement any changes would be approximately 2 months. This would include	✓	2 months

		designing the changes to the E2E diagrams and drafting the change proposal, to MDB approval and implementation. However, changes to the E2E diagrams are only implemented in line with our release strategy (releases in February, June and November).		
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy Power	-	Impact Comment: Re training will be necessary	✓	-

Comments on redline text

No.	Organisation	Section	Comment
1	Western Power Distribution	BSCP502 3.4.3.11 Action – Send MTDs	This should only happen on change of any details. "If appropriate" should be changed to "If any MTDs have changed or been corrected"
2	Western Power Distribution	BSCP502 3.4.2.1/3.4.2.2 BSCP514 5.4.1.2	In BSCP 502, any participant can raise a data inconsistency with the supplier (3.4.2.1), who passes it to the HHDC to investigate (3.4.2.2), who then passes it to the MOA if appropriate (3.4.2.5>3.4.3). In BSCP 514, the supplier can raise an investigate MS request direct with the MOA (5.4.1.2). This is still allowing inconsistency. It requires an additional step: "Supplier to send to HHDC", And remove "From – Supplier" from 5.4.1.2.
3	Western Power Distribution	BSCP514 5.4.1.2	If the supplier does raise an "investigate MS", there is no mechanism to reply direct with a D0005 (DTC says only MOA to HHDC). If the MOA sends a D005 to the HHDC, the HHDC will not necessarily be aware there is an investigation requested, and will therefore be unable to advise what action to take.
4	Western Power Distribution	BSCP514 5.4.1.14 Action – send MTDs	As per comment 1 above

5	Western Power Distribution	BSCP502 – appendix 4.4	Last reason “At the request of the supplier (on behalf of himself or any other participant)”
6	IMServ Europe	BSCP502 – 3.4.3.10	Within section 3.4.3.10 there is reference to section 3.3.6. Our view is that the section referenced relates to the replacements or reconfiguring of a MS, and if required should have already been carried out as part of the fault resolution. It does not therefore need to be referenced as part of a post resolution activity.

CP1208 - Changes to the Change of Profile Class Process set out in BSCP516

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓	Agree Change Comment: We fully support this change.	✓	-
E.ON UK Energy Services Limited	✓	Impact Comment: Changes to both systems and processes would be required to implement this CP	✓	-
EDF Energy, Supply	✓	-	✓	90
ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd	✓	-	X	0
Siemens Energy Services	✓	Impact Comment: This would have process impacts.	✓	90
UDMS	✓	-	X	-
Southern Electric Power Distribution; Keadby Generation Ltd; SSE	✓	-	X	0

Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;				
IMServ Europe Ltd	✓	Impact Comment: Minimal	✓	90
British Energy Direct Ltd	✓	Impact Comment: A change to our processes would need to be actioned	✓	90
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy Power	✓	-	X	-
Gemserv	-	No impact on MRA products	X	-

Comments on redline text

No comments on redlining

CP1209 - Inclusion of MSID Counts on the GSP Group Consumption Totals Report

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓	Impact Comment: Amendment to SONET	✓	-
EDF Energy, Supply	✓	Implementation Comment: For code changes to accept amended flow	✓	60
ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd	✓	Impact Comment: System changes will be required and minimum 90 days will be required to implement the change	X	90
UDMS	✓	-	X	-
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd;	✓	Agree Change Comment: But we would like clarification on how SVAA will calculate the MSID count. If the count is a total of the settlement period MSID count then it will render the CCC MSID count out by factor of 48.	X	15

Medway Power Ltd;				
British Energy Direct Ltd	✓	Impact Comment: A change to our systems and processes would be necessary.	✓	90
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy Power	✓	-	✓	60
E.ON UK Energy Services Limited	-	-	X	-
Siemens Energy Services	-	-	-	-

CP1211 - Changes to Codes of Practice 3, 5, 8 and 9 fusing requirements

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Western Power Distribution	✓	<p>BS 88-2 should be an acceptable alternate. BS 88-2 is used on switchgear (eg LV ACBs).</p> <p>The rated voltage and/or rupturing capacity also needs specifying. BS 88-6 includes 240V fuses (eg "SS") which are only rated at 165kA, whereas NS fuses are 415V rated and a fault rating of 80kA.</p> <p>Add the MOA should ensure any fuses on the load side of the BS88-6/BS 88-2 fuses also have an adequate rupturing capacity. There is little point of putting in "safe" fuses nearest the point of supply if the downside fuses are still liable to rupture.</p>	-	-
E.ON UK Energy Services Limited	✓	Impact Comment: Our current processes reflect this requirement	X	-
United Utilities Metering	✓	<p>Agree Change Comment: Safety Implications warrant reference to a specific fuse specification.</p> <p>Other Comments: Change will help ensure that LV CT operated metering installations comply with Electricity at Work Regulations 1989, specifically Regs 5 and 11.</p>	X	-
ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd	✓	-	✓	60

Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;	✓	-	X	0
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	X	Disagree Change Comment: Although we don't disagree with the proposed wording changes, we believe it is unclear as to who it is that would be responsible for supplying these fuses. We therefore do not support the change if it is a requirement for the MOA to supply the fuses - we believe this cost should fall on the distributor. We currently do not use BS88 type fuses and the switch would have a cost impact on us, whether the change was made retrospective or not. On a further note we do not understand what benefit there is to switch to the BSS 88 fuses and do not see this as safety risk to MO engineers or the customer.	✓	-
EDF Energy, Supply	X	Disagree Change Comment: No change to CoPs required as this does not affect Settlements. These safety requirements are addressed in regulation 24 of ESQC regulations. Impact Comment: This does not impact on systems or processes but on design and manufacture of equipment to support metering installations	✓	90
Association of Meter Operators	-	Neutral Comment: The AMO members will respond directly, nevertheless the following information is provided for consideration by ELEXON Other Comments: The BSC Metering CoPs are intended to define the BSC requirements for metering, naturally the metering installation should be safe, but wherever possible, for good governance, the BSC should not repeat existing legislation or regulation. The ESQC Regulations already cover this aspect in the following section: The Electricity Safety, Quality and Continuity Regulations 2002 (SI no. 2665):	-	-

		<p>“Equipment on a consumer’s premises</p> <p>24. — (1) A distributor or meter operator shall ensure that each item of his equipment which is on a consumer’s premises but which is not under the control of the consumer (whether forming part of the consumer’s installation or not) is—</p> <p>(a) suitable for its purpose;</p> <p>(b) installed and, so far as is reasonably practicable, maintained so as to prevent danger; and</p> <p>(c) protected by a suitable fusible cut-out or circuit breaker which is situated as close as is reasonably practicable to the supply terminals.</p> <p>(2) Every circuit breaker or cut-out fuse forming part of the fusible cut-out mentioned in paragraph (1)(c) shall be enclosed in a locked or sealed container as appropriate.”</p> <p>The Statutory Instrument drafting does not constrain the fuses to BS 88 as legal drafting would require frequent review and reissue whenever a change to a BS occurred. The obligation rests firmly on the distributor or meter operator. In the event of challenge, the Health & Safety Executive could require the responsible party to justify their approach to satisfy their obligations under this Regulation. Failure can lead to the an Offence under Regulation 35 up to “level 5 on the standard scale”.</p> <p>There appear to be three alternatives:</p> <ol style="list-style-type: none"> 1 Proceed with the CP, causing a duplication of regulation/governance 2 Amend the CP to refer to the ESQCR, but not mandate BS88 fusing <p>Reject the CP and rely on the existing ESQCR obligations</p>		
UDMS	-	-	X	-
Gemserv	-	No impact on MRA products	X	-
British Energy Power & Energy Trading Ltd	-	<p>Please clarify the proposed implementation method. Would the new requirement apply to all existing metering systems, or are you proposing to only apply it to new installations?</p> <p>As the justification for the change relates to potential safety hazards, it</p>	X	0

		would seem sensible to apply the change to all existing metering systems. If this is the case, consideration will need to be given to the timescales involved in checking and replacing all non-compliant fusing arrangements.		
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy Power	-	-	X	-

Comments on redline text

No Comments on redlining

CP1212 - Improvements to BSCP27 identified during operational use.

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Western Power Distribution	✓	-	-	-
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓	<p>Agree Change Comment: We agree that re-inspections should not apply to 'observation' non compliances and the proposed new wording regularises that. It might be just a matter of style but we feel it would read better as follows:</p> <p>"At the end of a quarter, the TAA SHALL SELECT a sample of 10% (or any other percentage as determined by the Panel) of the category 1 non-compliances that a participant has rectified during the quarter and then SHALL CARRY out an inspection etc..."</p> <p>For consistency, line 3 of clause 1.9.2 should read "...20% of the total number of visits agreed by THE PAB to be performed each year".</p>	-	-
E.ON UK Energy Services Limited	✓	<p>Agree Change Comment: This will improve clarity</p> <p>Impact Comment: Minor changes to procedures</p>	✓	-
EDF Energy, Supply	✓	-	X	0
ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd	✓	<p>Implementation Comment: To allow changes to internal documentation</p>	X	30

Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;	✓	-	X	0
British Energy Direct Ltd	✓	-	X	0
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy Power	✓	-	X	-
UDMS	-	-	X	-
Gemserv	-	No impact on MRA products	X	-

Comments on redline text

No comments on redlining

CP1213 - Improvement to Proving Test process: Audit trail

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
SSIL	✓	Impact Comments: Improved procedures for the recording of reasons for delay	✓	30
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓	The proposed amendments to the BSCPs are acceptable providing that in its interpretation the need for an audit trail applies to both the original proving test and any re-test. If there is any doubt, it might be useful to add some words for the avoidance of doubt.	-	-
E.ON UK Energy Services Limited	✓	Agree Change Comment: A robust Audit trail is vital to ensure compliance Impact Comment: Minor changes to procedures will be required.	✓	-
EDF Energy, Supply	✓	Implementation Comment: To amend current audit processes.	✓	30
ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd	✓	Impact Comment: In order to maintain the audit trail changes will be required to internal systems	✓	180
Siemens Energy Services	✓	-	✓	90

UDMS	✓	-	✓	60
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;	✓	-	X	0
IMServ Europe	✓	It is not clear what represents an adequate audit trail as required in order to explain the delay as stated in the redlining of BSCP514 at v10.0. However, the provision of a process that allows Wheatley MOP users to track the history of related proving DTC Flows, while incrementing working days left to prove by COP rating, along with the ability to record a history of unstructured notes is deemed sufficient for purpose. On this assumption it is believed that the current version of Wheatley MOP as deployed already complies with this requirement.	X	0
British Energy Direct Ltd	✓	Impact Comment: Processes will need to be reviewed	✓	30
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy Power	✓	-	X	-
Gemserv	-	No impact on MRA products	X	-

Comments on redline text

No comments on redlining

CP1214 - Removal of PSL 130 ('Half Hourly Data Collection') following the creation of a generic non functional PSL via CP1182

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓	Agree Change Comment: We are happy that the obligations have been mapped correctly.	-	-
E.ON UK Energy Services Limited	✓	Agree Change Comment: This is in line with previously agreed processes	X	-
EDF Energy, Supply	✓	-	X	0
ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd	✓	-	✓	0
Siemens Energy Services	✓	-	✓	90
UDMS	✓	-	X	-
Southern Electric Power Distribution; Keadby Generation Ltd; SSE	✓	-	X	0

Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;				
IMServ Europe	✓	Agree Change Comment: Following clarification as to the justification for the approach taken we are in agreement with the changes proposed.	-	-
British Energy Direct Ltd	✓	The referencing is unclear in the following redline extract; Redlined Extract from BSCP537 Appendix 1 – BSCP 502 referencing in question 9.2.6, question and guidance 9.2.7 Redlined Extract from BSCP502 – 3.2.3, 3.2.4 and 3.2.7	X	0
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy Power	✓	-	X	-
Gemserv	-	Clause 29.3 of the MRA has references to the BSCP and the PSL so this will need to be amended. As this is a priority provision consent will need to be sought from the Authority. The change will require 2 months from initial design to approval by MDB (change management authority) before Authority consent is requested. This may take a number of months to receive. Changes to the MRA are implemented in line with our release strategy (releases implemented in February, June and November).	✓	2 months

Comments on redline text

No comments on redlining