

**DCP0005 Impact Assessment Recommendations, High Level Comments and Redline Issues Log**

| <b>Party</b>     | <b>For</b> | <b>Against</b> | <b>No comment</b> | <b>Implementation timeframe</b> |
|------------------|------------|----------------|-------------------|---------------------------------|
| NGC              |            | ✓              |                   | -                               |
| Keith Sullivan   | ✓          |                |                   | -                               |
| WPD              | ✓          |                |                   | -                               |
| Npower           |            | ✓              |                   | -                               |
| EDF              |            |                | ✓                 | -                               |
| E.ON UK          |            | ✓              |                   | -                               |
| E.ON PT          |            | ✓              |                   | 120 days                        |
| United Utilities |            | ✓              |                   | -                               |
| Centrica         |            | ✓              |                   | 180 days                        |
| E.ON ES          | ✓          |                |                   | -                               |
| Siemens ES       |            | ✓              |                   | -                               |
| British Energy   |            | ✓              |                   | 90 days                         |
| AMO              |            | ✓              |                   | -                               |
| SAIC             | ✓          |                |                   | 270 days                        |
| S & S            |            | ✓              |                   | 6 months                        |
| <b>Total</b>     | <b>4</b>   | <b>10</b>      | <b>1</b>          |                                 |

**Responses to specific questions**

**Q1 Settlement seal for calibrated meters? – pre installation**

|            |   |
|------------|---|
| NGC        | N/A   |
| K.Sullivan | Yes (wire & ferrule) but will take time to implement therefore alternatives are acceptable.                 |
| WPD        | No such thing as a Settlement seal. Specified seal (ideally) or, where not possible, an indicative seal.    |
| Npower     | No. Happy for test facility to provide own sealing after calibration. Seals should be manufacturer's seals. |
| EDF        | N/A   |
| E.ON UK    | No. Facility calibrating equipment can provide own seal which gives clear indication of having been opened. |
| E.ON PT    | N/A   |
| Centrica   | Yes.  |
| E.ON ES    | Needs to be a Settlement seal for consistency throughout the country.                                       |

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|                |  |
|----------------|--|
| Siemens ES     | No. Test facility must be allowed to provide own sealing in any acceptable format. |
| British Energy | N/A  |
| AMO            | Seal appropriate to design of Metering Equipment (preferably wire, if not paper).  |
| SAIC           | Needs to be a Settlement seal.   |
| S&S            | N/A  |

### **Q2** Should these requirements be specified in CoP4 or BSCP 06 and BSCP 514?

|                |  |
|----------------|--|
| NGC            | N/A  |
| K.Sullivan     | Neither – MOCOPA   |
| WPD            | Neither – MOCOPA   |
| Npower         | CoP4. Leave reference to MOCOPA in BSCP514 appendix and add reference to MOCOPA to CoP4.   |
| EDF            | N/A  |
| E.ON UK        | Not in BSCP06 or BSCP514. These are obligations for MOAs and should not be passed to external bodies. CoP4 may require the meters are sealed. MOA should ensure that this is carried out by test facility.         |
| E.ON PT        | N/A  |
| Centrica       | CoP5 refers to MOCOPA. Settlement seals only relate to CVA metering, therefore, if this is the case it will need to be detailed in BSCP relating to SVA market.  |
| E.ON ES        | CoP4 should allude to correct sealing such that if sealing arrangements change CoP4 will not be directly influenced.   |
| Siemens ES     | No. To specify calibration sealing methods in CoP4 or BSCP is not appropriate. This is more applicable to IEC design standards. In this was the sealing arrangement can form part of the Product Approval process. |
| British Energy | N/A  |
| AMO            | No. Cannot be proscribed in CoP4 or BSCP06 unless hardware has been specified to accommodate that method of sealing under CoP1, 2, 3, 5 etc.   |
| SAIC           | Specify in BSCP06 and BSCP514 and have reference to them from CoP4.  |
| S&S            | N/A  |

### **Q3** Replacing of inaccurate equipment should be specified in CoP4 or aligned with Meter fault processes in BSCPs?

|            |   |
|------------|---|
| NGC        | N/A   |
| K.Sullivan | BSCPs as a Meter fault  |
| WPD        | BSCPs as a Meter fault  |
| Npower     | Reference should be made in CoP4 to the relevant CVA and SVA agent obligations within these sections. |
| EDF        | N/A   |

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|                |  |
|----------------|--|
| EON UK         | COP4 should say 'where found to be out of calibration then replace, adjust or recalibrate in accordance timescales in BSCPs'.      |
| EON PT         | N/A  |
| Centrica       | Yes.   |
| E.ON ES        | Allude to in CoP4 but detailed in existing meter fault processes in BSCPs.   |
| Siemens ES     | Yes. 1% sampling proposed could mean meters remain unchecked for 15 years. Corrective action plan may be more appropriate in BSCP. |
| British Energy | N/A  |
| AMO            | Meter found outside accuracy becomes a metering fault from the point of identification.  |
| SAIC           | Align with Meter fault processes in BSCP06 and BSCP514.  |
| S&S            | N/A  |

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High level comments

| <b>Issue</b>   | <b>Proposal</b>                                     | <b>Action</b> | <b>Raised by</b> | <b>ELEXON response</b>  | <b>E.G. Response</b> |
|--|---|---------------|------------------|---|----------------------|
| CVA – SVA differences  | Two separate documents (SVA and CVA) are necessary. |               | NGC              | This was considered early in the process of the review. However, the E.G. considered that the fundamental requirements are identical and should be split by market where appropriate in a single document.  |                      |
| CoP effective date   | Change Section L                                    |               | NGC              | ELEXON recognises the issue however it <u>cannot</u> make change to the BSC. Only a BSC Party can raise a proposal in this regard. Further, as a result of this consultation, further changes have been proposed that make the CoP4 less retrospective.   |                      |
| Review cut short by ELEXON   |   |               | NGC              | ELEXON considers that no new substantive arguments were raised in the latter stages of the review. At the time ELEXON believed that any remaining issues could be resolved by correspondence. Further meeting is proposed.  |                      |
| Requirements changed post review group   |   |               | Keith Sullivan   | Reviews were conducted by ELEXON after the final E.G. draft, specifically to ensure consistence with the BSC and suitability for Settlement. This resulted in some cases, as the requirements being subtly but materially changed. ELEXON has recognised the issues and has addressed them in this impact assessment. |                      |
| Considerably more work is required   | ELEXON should form an expert group before the CP    |               | E.ON UK          | ELEXON will deal with minor changes to document suggested during impact assessment and put outstanding issues to an expert group  |                      |
| Significant issues exist especially retrospective ones. Calibration routines and accuracy requirements need further revision |   |               | E.ON PT          | Issues mentioned have been mitigated as a result of red line comment incorporation. Issues may still exist for expert group discussion.   |                      |

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|   |  |  |                           |  |  |
|---|--|--|---------------------------|--|--|
| <p>Disagree with calibration periods for working standards and BSCCo to recover costs from MOAs. Also don't agree with using CoP as reference for tables B1 and B2.</p> | <p>Use meter class accuracy for tables B1 and B2</p>   |  | <p>UU</p>                 | <p>Period between calibrations for working standards was set by EG. This can be extended with evidence. Cost recovery exists in current version. Expert group to consider whether it is appropriate to use meter class accuracy as references for table B1 and B2.</p> |  |
| <p>Change does not fully acknowledge work on Smart metering and may contradict what is already in place.</p>  |  |  | <p>Centrica</p>           | <p>Message left with respondent to contact ELEXON for clarification (21/05/07).</p>  |  |
| <p>Too many typographical/clarity errors and some fundamental changes not fully defined/acceptable.</p>   | <p>Resolve issues and produce a revised version which addresses issues from consultation</p> |  | <p>AMO</p>                | <p>Typographical errors addressed and clarity added as a result of impact assessment comments. Major issues to be decided by expert group.</p>   |  |
| <p>Great deal of work to be done to make CP fit for purpose</p>   | <p>Do not believe there will be time to implement for 2008</p>                               |  | <p><del>SSESAIG</del></p> | <p>Depending on progression of CP it is possible that some parties will not be able to implement the changes for 2008. Appropriate implementation date to be recommended by ELEXON to Panel Committees for decision.</p>   |  |

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Comments on the red lining of Draft CoP4

| <b>Issue</b>                                    | <b>Section No.</b>                   | <b>Action</b>  | <b>Raised by</b> | <b>Reference</b> |  |
|---|--------------------------------------|--|------------------|------------------|--|
| Change made to section 6 to accommodate NHH     | 6                                    | E.G. to consider   | Keith Sullivan   | 2                |  |
| Link inaccurate meters to meter faults          | 1                                    | E.G. may wish to link accuracy failure to Meter fault processes  | SES              | 146              |  |
| Link inaccurate meters to meter faults          | 1                                    | ELEXON to consider raising a Dispensation covering legacy issues as this change represents an exceptional circumstance | SES              | 146              |  |
| New defined term – Test Houes                   | 3                                    | Does E.G. agree  | UU               | 4                |  |
| Cal for changes to compensation parameters      | 5.1.1                                | E.G. to consider whether a type B or C cal is required following changes to compensation parameters                    | Npower           | 49               |  |
| Conflicting definition of Traceable             | 4.20                                 | E.G. to consider   | Npower           | 48               |  |
| When is new equipment new?                      | 5, 5.2 and 5.3.1                     | ELEXON to draft solution for EG comment.   | AMO              | 111 & 5          |  |
| Test points in Appendix B conflicts with BS EN. | Section 5.1.2.1 – Type A Calibration | E.G. to consider   | Many             | 248              |  |

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| <b>Issue</b>  | <b>Section No.</b>                   | <b>Action</b>  | <b>Raised by</b> | <b>Reference</b> |  |
|---|--------------------------------------|--|------------------|------------------|--|
| Clarification of 'product standard'   | Section 5.1.2.1 – Type A Calibration | E.G. to consider                                     | Many             | 248              |  |
| Type C cal's can be performed on site which is a concern for high end Meters.   | 5.1.2.3 Type C Calibration           | E.G. to consider                                     | E.ON UK          | 100              |  |
| Cals for existing CoP 1 & 2 Meters. Requirements are unclear  | 5.1.2.4                              | E.G. to give consideration to a simplified paragraph | Keith Sullivan   | 13               |  |
| Implications for manufacturers to provide uncertainties?  | 5.1.4                                | E.G. to consider.                                    | E.ON UK          | 74               |  |
| BS EN 17025 covers calibration. Is this preferable to ISO 9001 as quoted?   | 5.1.4.5 QA                           | E.G. to provide a view.                              | E.ON UK          | 78               |  |
| Sample Cals – use of the term "new meter types" is not relevant.  | 5.2                                  | ELEXON to redraft section for E.G. consideration.    | WPD              | 35               |  |
| Manufacturers have not had any input into the development of the CoP and may not be aware of its forthcoming issue. These requirements may not be | 5.3.3                                | E.G. to consider                                     | EON              | 82               |  |

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| <b>Issue</b>  | <b>Section No.</b> | <b>Action</b>  | <b>Raised by</b> | <b>Reference</b> |  |
|---|--------------------|--|------------------|------------------|--|
| achievable.   |                    |  |                  |                  |  |
| What is the value (& therefore justification) for needing uncertainty statements?                                   | 5.3.3 & others     | E.G. to give consideration to the justification for the requirement to provide certificates with uncertainty statements. | BE               | 218              |  |
| No need to commission the whole system when for example a meter is replaced.  | 5.5.2 (was 5.5.1)  | E.G to review ELEXONs text.  | AMO              | 115              |  |
| This has a specific exclusion for existing metering equipment. Should this apply to all paragraphs in this section? | 8.1.1              | E.G. to consider   | EON              | 91               |  |
| Calibration intervals for Working Standards   | 7.3.2.1            | E.G. to consider proposal to calibrate WSs every 6 months with option to extend further.                                 | UU & SES         | 166 & 157        |  |
| Should the all requirements under 8.1 Records be made not retrospective   | 8.1                | E.G. to consider   | EON UK           | 91               |  |
| Footnotes   | 8.1.3              | E.G. to consider wording and use of  | SSE              | 196              |  |



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| <b>Issue</b>  | <b>Section No.</b> | <b>Action</b>                 | <b>Raised by</b> | <b>Reference</b> |                                      |
|---|--------------------|-------------------------------|------------------|------------------|--------------------------------------|
|   |                    | footnotes                     |                  |                  |                                      |
| Reactive Calibration period.  | Appendix A         | E.G. to consider              | AMO              | 121              |                                      |
| No incentive to use type B calibrations   | Appendix A         | E.G. to consider              | SES              | 159              |                                      |
| Test points should be as required for Certification.  | Appendix B         | E.G. to consider              | WPD              | 42               |                                      |
| The re-test values of Type C Calibrations need to be a subset of the Type A Calibrations. Table B4 has more test points than the current table B2 for COPs 5, 6 & 7. Table B4 needs to reflect whatever changes result from point 17 above. | Appendix B         | E.G. to consider              | WPD              | 45               |                                      |
| Excessive test points in table B3.  | Appendix B         | E.G. to consider              | Npower           | 60               |                                      |
| Tables c1 and C3 don't align with appendix B  | Appendix B         | ELEXON to investigate further | SSE              | 199              | Neil Green to call for clarification |
| Comment 1. For consistency with Table B2 (which requires testing at 1% current), the lowest current rating  | Appendix C         | E.G. to consider              | BE               | 238              |                                      |

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|---|-------------|-----------------------|-----------|-----------|--|
| for Transformer Operated Meters in Table C1 should be defined as "0.01 I <sub>n</sub> ".  |             |                       |           |           |  |
| Comment 5. Accuracy limits in Tables C1 – C3 are defined by meter classes for the test points in Tables B1 – B4 which are defined by Codes of Practice. For clarity BE suggest both sets of tables should be based on CoPs. | Appendix C  | E.G. to consider      | BE        | 238       |  |
| Suggestion to take ambient Temp into account. Also test equipment uncertainty and specify lab testing for CVA.  | Appendix D  | E.G. to consider      | SES       | 160       |  |
| Comment 1 is not clear. Comment 3 - discrete measurement transformer?   | Appendix D  | ELEXON to investigate | BE        | 239       |  |

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|---|--------------------|------------------|------------------|------------------|--|
| No incentive to calibrate at higher accuracy. Values in D2 and 4 not consistent with D1 and 3 | Appendix D         | E.G. to consider | EON              | 277              |  |
| Appendix E not considered by E.G.   | Appendix E         | E.G. to review   | Keith Sullivan   | 26               |  |
| Remove guidance from CoP.   | Appendix F         | E.G. to consider | AMO              | 127              |  |