Issue Form - BSCP40/04	Issue Number: 49 *(mandatory by BSCCo)*

Issue Title *(Mandatory by originator)*

Change of Measurement Class (CoMC) process for Advanced Meters

Issue Description *(Mandatory by originator)*

Electricity supply standard licence condition 12 requires that by 6 April 2014, Suppliers must not supply electricity at any Metering Point in Profile Classes 5 to 8 other than through an Advanced meter. From that date the CoMC process from Non Half Hourly (NHH) to Half Hourly (HH) is likely to involve a NHH Meter which is already HH capable (assuming that the majority of Metering Systems changing from NHH to HH will be in Profile Classes 5 to 8). So in most cases a change of Meter will not be needed and in many cases a site visit by the Meter Operator Agent (MOA) will not be required. Whilst the current BSCP processes make some allowances for a CoMC with no change of Meter, they do not fully embrace the possibility that a CoMC can take place without the need for a site visit by the MOA.

Appendix 1 sets out in more detail where the CoMC process may need to change in order to better reflect how changes in metering functionality will be carried out for advanced Meters.

Justification for Examining Issue *(Mandatory by originator)*

ELEXON has been asked to review the CoMC process by the Profiling and Settlement Review Group (PSRG). The PSRG wants to ensure that the complexity (real or perceived) of the CoMC process does not act as a barrier to elective HH Settlement.

Potential Solution(s) *(Optional by originator)*

At its meeting on the 1 May 2013, the PSRG agreed ELEXON's recommendation that the issues in Appendix 1 should be considered by a BSCP40 Issue Group. This will allow experts in the execution of the CoMC process – Suppliers, MOAs and DCs – to validate the thinking in this paper and to identify further issues/improvements.

Proposer's Details

***Name*……**

***Organisation*……ELEXON (on behalf of the Profiling and Settlement Review Group (PSRG))……**

***Email Address*….elexon.change@elexon.co.uk……..**

***Telephone Number……0207 380 4293*……..**

***Date*……..**

Appendix 1 - Issue Catalogue

The table below lists a number of issues that have been identified by ELEXON and reviewed by the Profiling and Settlement Review Group (PSRG). It is recommended that the Issue Group should review this list for completeness, include additional issues as appropriate, and identify solutions.

Please note that the scope of this issue is the CoMC process for advanced Meters. Any changes to how Meter Technical Details are maintained and distributed for smart Meters will have an impact on the CoMC process. The Smart Meter Technical Details Workgroup has deferred consideration of the CoMC process pending decisions on Modification Proposal 'Amending Supplier & Meter Operator Agent responsibilities for smart Meter Technical Details' (P292) and 'Meter Technical Details for Smart Meters' (CP1388). This is on the understanding that CoMC from Profile Class 1-4 to HH is unlikely to occur in large numbers at the start of the mass roll-out of smart Meters. Please note that it has been confirmed by PSRG members that there are no elective HH domestic customers at present.

Issue	Title	Description
1	Meter Exchanges	Whether or not the CoMC process will require a change of Meter for Profile Class 5 to 8 Metering Systems will depend on the type of Meter already installed and whether the change is elective or mandatory. An elective CoMC from NHH to HH will not require a change of Meter. A mandatory CoMC will only require a change of Meter if the existing Meter isn't compliant with Code of Practice (CoP) 5 or above (i.e. is a CoP 10 Meter only). The BSCP CoMC processes need to be clear about this distinction.
2	Site Visits	No site visit will be needed on change to elective HH, if no change to any communications modules is required and the Meter can be reconfigured remotely or the Meter does not require reconfiguration in order for the Half Hourly Data Collector (HHDC) to read the HH data. The Supplier may already be retrieving HH data from the NHH Meter and making these available to the customer for energy management purposes. For a change to mandatory HH, the HH Meter Operator Agent (HHMOA) may need to attend site to carry out a proving test, although where the communications are enabled, the HHMOA may be able to carry out a proving test remotely. The BSCP CoMC processes need to be clear about this distinction.
3	Use of the D0142 flow	The D0142 ('Request for Installation or Change to a Metering System Functionality or the Removal of All Meters') flow is used to instruct the HHMOA to replace the NHH Meter with a HH Meter (or vice versa). Whilst this is appropriate for a CoMC requiring a Meter exchange or Meter re-configuration, consideration needs to be given to what should be sent (if anything) when no site visit or remote configuration is needed in order for the new DC to take HH (or NHH) readings – i.e. when the MOA has no involvement in changing the functionality of the Meter. The Supplier might wish to leave the decision as to whether metering needed exchanging or re-configuring to the new HHMOA, in which case a D0142 would still be sent. The D0142 might also be needed as a vehicle for the Supplier to instruct the HHMOA (e.g. via 'Additional Information' data item) to take final readings (depending on the outcome of issue 7 below). Consideration also needs to be given to the use of the D0142 as a trigger for the HHMOA to send a D0170 ('Request

Issue	Title	Description
		for Metering System Related Details) to the LDSO.
4	Notifying the incoming MOA of a CoMC	The BSC Auditor has noted in Market Issue 1640 ('Lack of clarification regarding MOA BSCP requirements') that "it can be difficult for the incoming Meter Operator to identify a CoMC from any other appointment as there is no flag or code in the D0155 – although there is one, albeit rarely used, in the D0151". The BSC Auditor goes on to note that "often the D0142 flow is the point at which they are identified but only via the free text entered by the Supplier, which is extremely variable in its extent and quality".
5	MO and DC roles	One of the main difficulties with the CoMC process is that it requires high levels of manual oversight. Difficulties in executing the process often arise when the Meter replacement doesn't occur on the planned date. The agent appointment/de-appointment processes need to be invoked ahead of the Meter replacement in order to allow time for the transfer of data necessary to allow it to take place. If the exchange doesn't take place on the planned date, HH agents are left responsible for a NHH Meter (or vice versa) or appointment/de-appointment dates need to be revised. These problems will be alleviated for those advanced Meters which don't require new communications or reconfiguration or can be configured remotely, but will persist where a site visit is still required. Although the CoMC process should be simpler where no site visit is required, this introduces new challenges in terms of the roles of the MOA and DC. The MOA and DC roles in the CoMC process may vary depending on the circumstances, so consideration needs to be given to how the Supplier should manage this. Should process differentiation be limited for the sake of simplicity? Or should two distinct processes be followed with a standardised method of notifying whether a site visit is required or not.
6	Timing of appointments	Under MRA Working Practice 66, the Supplier informally appoints the HHMOA, notifying them of the proposed HHDC, and sending a D0142. The formal appointment flows are not sent until the HHMOA has confirmed the CoMC. This Working Practice was developed before BSCP514, so it would be useful to understand to what extent it is still used and how it would be applied in the case where a CoMC may or may not require a customer appointment.
7	Final Readings	Where a meter exchange is required, this is carried out by the HHMOA. The HHMOA passes the final NHH readings to the NHHMOA in order to pass onto the NHHDC. If no metering or communications changes are needed and the HHMOA has no involvement in the process, the final NHH readings could be taken by the HHDC. These readings could be transferred from HHDC to HHMOA to NHHMOA to NHHDC. This would provide consistency with CoMC events where a meter exchange is required, but is arguably inefficient. An alternative would be a direct transfer of the D0010 from HHDC to NHHDC (not currently supported by the Data Transfer Catalogue (DTC)) or transfer via the Supplier. Another option would be for the NHHDC to take the final reading(s). This would be simplest in terms of execution, but might present difficulties in terms of continuity between the final reading taken by

Issue	Title	Description
		the NHHDC and the initial HH readings taken by the HHDC (unless a midnight standard were feasible).
8	Transfer of readings	The BSC Auditor has noted in Market Issue 1640 ('Lack of clarification regarding MOA BSCP requirements') that "One of the requirements is that the incoming MOA is required to send the final meter register readings to the outgoing MOA on a D0010 flow, or if the reading is not available a D0002 flow should be sent. However the principal method of communication between these Agents, the DTN, does not support the sending of these flows between MOAs".
9	Missing Readings	BSCP514 7.1.21 and BSCP504 3.3.1.8 require that the NHHDC should request missing final readings from the NHHMOA and the Supplier. Depending on the solution to issue 7 above, the options for chasing missing final reads may vary depending on which participant has responsibility for the obtaining the final reading(s).
10	Continuity of readings	Where a Meter exchange is required, the HHDC has to submit zero readings for those Settlement Periods on the day of the exchange (which will have an impact on performance, if flagged as estimates). The energy consumed in those Settlement Periods will be taken account of by the final reading on the NHH Meter. Where there is no Meter exchange, and the Meter has been recording HH data, the HHDC should be able to take HH readings from midnight start of day. Processing these readings will result in double-counting unless the Meter (like SMETS Meters) stores midnight cumulative reads. An alternative processes, adopted by at least one Supplier, is to appoint the HHDC from the day following the CoMC, leaving the NHHDC appointed on the day itself. This resolves the NHH side of the issue, but impacts Settlement to the extent that no usage is recorded for the time period between the Meter exchange and midnight on that day.
11	Re-dating of readings	BSCP514 7.1.8 requires the NHHMOA to re-date the final readings from the HHMOA to the previous day. This was introduced to avoid the constraint in some NHHDC (or NHHMOA) systems whereby a reading dated after their appointment end-date cannot be processed. It would be useful for the Issue Group to establish whether these constraints remain, whether the workaround is successful and whether advanced Meters provide an opportunity to make this transition more seamless.
12	Proving Tests	BSCP514 7.1.16 and 7.2.16 require the HHMOA to 'prove MS'. CoP 10 Metering Systems are exempt from proving tests (as defined in BSCP502), so a clarification is needed to this effect.
13	Use of D0150 and D0313	BSCP514 7.1.19 would benefit from clarification that 'Notification of Meter removal' (via the 'Non Half-hourly Meter Technical Details' (D0150) flow) is 'as required', and that the 'Auxiliary Meter Technical Details' (D0313) is only required when the Metering Equipment (including communications devices) remains in situ. Consideration needs to be given to whether a D0150 should be sent to the HHMOA, where the same Meter is being used, to help

Issue	Title	Description
		the HHMOA to construct a D0268. The BSC Auditor has raised (or is considering raising) issues in this area.
14	Sharing of Meter Technical details	The BSC Auditor has noted in Market Issue 1640 ('Lack of clarification regarding MOA BSCP requirements') that "the process requires the sharing of Meter Technical Details but often MOA systems are not configured to accept those flows which can then hamper the process, e.g. a HHMO will send a D0268 to a NHHMO or a NHHMO will send a D0150 to a HHMO".
15	Concurrent service cable upgrades	An issue has been raised under the Master Register Agreement (MRA) about the situation where a CoMC occurs at the same time as an upgrade to the service cable due to an increase in load capacity. Customers may require the existing NHH supply to co-exist with the new HH supply for a period of time before being switching completely to the HH supply. This is arguably a new HH connection, followed by a NHH disconnection, rather than a CoMC, but guidance about which process should be followed may be useful.
16	Notification of 100kW sites to the Panel	The P0028 100kW Demand Report is used by NHHDCs to report potential 100kW sites to the Supplier. BSCP504 3.4.1.8 requires the NHHDC to send the P0028 100kW Demand Report to the Panel. It is unlikely that NHHDCs are sending these reports to the Panel or that the Panel would know what to do with them if received. This requirement could be removed.
17	Guidance Note on Change of Measurement Class	ELEXON's 'Guidance Note for Change of Measurement Class and Change of Profile Class' was last updated in September 2008. An updated draft is included as Attachment A. Further updates may be required as a result of the Issue Group's conclusions.