PUBLIC

P283 Process Implementation Check Findings Report

Technical Assurance of Performance Assurance Parties

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ELEXON

P283 PROCESS IMPLEMENTATION CHECK FINDINGS REPORT

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EXECUTIVE SUMMARY

Through a review of the P283[1] process we found specific non-compliances against individual role types. The main gap areas or weaknesses highlighted were;

- Lack of Commissioning or long delays in performing Commissioning by System Operators (Licenced Distribution Network Operators (LDSO)/Independent Distribution Network Operators (IDNOs)) and Meter Operator Agents (MOAs);
- Continued difficulties in communication between System Operators, MOAs and Suppliers;
- Bespoke contractual and internal process arrangements meaning that the process is still not consistent across the industry;
- A clear need for timescales for the P283 process;
- Missing manufacturers Current Transformer (CT) and Voltage Transformer (VT) Calibration Certificates are still an issue;
- Inconsistent Commissioning records across industry from LDSOs; and
- We have observed that the teams that deal with this process are quite small (2-3 full time equivalent (FTE) generally) so there is still a large backlog for many Parties and Party Agents.

Despite the highlighted non-compliances, where the whole end to end process has been followed by all Party types as per the obligations, the process fulfils the initial intention of P283.

Full discussion of these points is contained within this Findings Report.

[1] Modification P283 "Reinforcing the Commissioning of Metering Equipment Processes".

P283 PROCESS IMPLEMENTATION CHECK FINDINGS REPORT

WHAT IS THE TECHNICAL ASSURANCE OF PERFORMANCE ASSURANCE PARTIES (TAPAP)?

The Technical Assurance (TA) technique is used as a detective tool and forms part of the Performance Assurance Framework (PAF). It consists of an on or off-site check of compliance against the Balancing and Settlement Code (BSC) and it's Code Subsidiary Documents (CSDs), commonly known as a TA check or audit. We also use this process to investigate particular processes in the market, which can lead to opportunities for improvement to the BSC arrangements.

The Performance Assurance Board (PAB) agrees the scope of work for Technical Assurance, within the Risk Operating Plan (ROP) every year. The scope sets out the details of the checks which are designed to provide assurance on high-risk processes and any areas not covered by other PAF techniques.

The PAB approved the ROP and TA scope for 2015/16 at its October 2014 meeting (PAB165). Following the results of the initial TA check, the PAB requested a second round of TA checks be added to the scope of the ROP.

THE P283 COMMISSIONING PROCESS TAPAP CHECK

Why investigate the P283 Commissioning process?

Modification P283, "Reinforcing the Commissioning of Metering Equipment Processes", was implemented on 6 November 2014. The Modification placed Commissioning obligations on the equipment owner, shifting responsibility for the Commissioning of Measurement Transformers from MOA to the LDSO (or Transmission Company where applicable). It also placed an obligation on the MOA to inform the Registrant of the Commissioning status of each Metering System. Under P283, MOAs retain responsibility for the overall accuracy of the Metering System. Introducing an obligation for the MOA to communicate the Commissioning status of a Metering System to the Registrant of that Metering System (typically the Supplier) was intended to ensure that the Supplier had a complete picture of the status of its Half Hourly (HH) portfolio. The Supplier should then take corrective action where there was a gap in the Commissioning process or where Commissioning of a Metering System hadn't been completed or notified with records retained.

The Commissioning process, as detailed in Code of Practice (CoP) 4, is designed specifically to prove the accuracy of Metering Systems. The process will detect any inherent metering problems that would otherwise not be identified. Any failure in this process has the potential to materialise into Settlement Errors that may not be identified until a later date.

A check was completed on the P283 process in the 2014/15 BSC year and the findings of this check were reported to PAB and published on the ELEXON website in April 2015. Performing the check soon after implementation meant that we could identify process breakdowns early, and take action to solve these. After the results of the 2014/15 P283 TAPAP check the PAB requested that we perform another check on P283 processes.

P283 PROCESS IMPLEMENTATION CHECK FINDINGS REPORT

Who did we check?

We audited 15 System Operators (comprising 14 LDSOs and one IDNO) with new Metering Equipment installed for HH Measurement Class C[2] Metering Systems on or after 6 November 2014.

We audited six HH MOAs with new appointments for HH Measurement Class 'C' Metering Systems energised on or after 6 November 2014.

We audited two Suppliers with new appointments for Half Hourly Measurement Class 'C' Metering Systems energised on or after 6 November 2014.

We used questioning and witnessing techniques to assess the processes that Parties and Party Agents follow for compliance to the BSC and its CSDs.

What did we look at?

The check was designed to investigate the respective responsibilities of each Party and Party Agent, with a view to gaining a clear overall picture of how well the P283 process is working. With almost 12 months having passed since the P283 Modification implementation, Parties and Party Agents should have fully embedded new practices in their processes to meet their obligations. The check looked to identify any process breakdowns or omissions that still exist so that we can work to rectify these. The checks looked at the following:

LDSOs/IDNOs

- Commissioning records for measurement transformers installed on or after 6 November 2014 for HH Measurement Class 'C' MPAN[3]s;
- Evidence of communication with the MOA/Registrant who requests Commissioning record for Metering Equipment;
- Evidence of attempts to rectify potential risk to Settlement with the MOA/Registrant where the LDSO has been contacted with a request to provide evidence of Commissioning;
- Evidence that the LDSO shows an understanding of the P283 Commissioning obligations;
- Where the LDSO employs contractors to install its Metering Equipment, evidence that the LDSO has taken steps to build into the contract the obligations for this process; and
- Where the LDSO employs contractors to install its Metering Equipment and has yet to renew the contract since P283 implementation, evidence that the LDSO has taken steps to recover Commissioning records.

HHMOAs

- Evidence that the MOA has evaluated the measurement transformer Commissioning record and the Meter Commissioning record to determine overall accuracy of the Metering System;
- Where the LDSO has not provided a Commissioning record for measurement transformers relating to the MPAN, evidence that the MOA has contacted the LDSO to request the Commissioning documentation;
- Where the LDSO has still not provided a Commissioning record after contact has been made that the issue has been escalated to the Supplier;

[2] 100kW or above Metering Systems are classified as Measurement Class 'C' (unless they are "unmetered" in Class D).
[3] MPAN: Meter Point Administration Number

- Evidence of the provision of a Commissioning report to the Registrant of the relevant Metering System advising Commissioning status, and highlighting any areas of concern;
- Evidence that the MOA shows an understanding of the P283 Commissioning obligations; and
- Where the LDSO is not the Metering Equipment owner (not owned by a BSC Party), evidence that the MOA has carried procedures to Commission both the the Measurement Transformers and the Metering Equipment on site.

HH Suppliers

- Evidence of a process in place to receive Commissioning reports from the MOA;
- Evidence of attempts to rectify potential risk to Settlement with the MOA/LDSO where the MOA has highlighted missing or incomplete Commissioning of a Metering System;
- Where the MOA has escalated to the Supplier specifically that the LDSO has not provided Commissioning records, action has been taken to resolve this issue; and
- Evidence that the Supplier has documentation identifying Commissioning obligations, including a process to respond to MOA and LDSO requests.

The check also looked at the internal procedures and processes in place by each Party and Party Agents, and looked at supporting documentation where relevant.

KEY FINDINGS

The most important elements for the efficient working of the P283 Commissioning process are as follows:

- There must be a well-defined, formalised and agreed process for the Commissioning of Metering Systems;
- There must be good communication between the Parties and Party Agents involved;
- There must be good quality information in the investigation of a gap in the Commissioning process;
- There must be adequate expertise to investigate any gaps in the Commissioning process;
- There must be good quality information coming out of the result of the investigation; and
- The outcome of the investigation must be communicated to all Parties and Party Agents involved.

Through our review of this process we found specific non-compliances against individual role types. We marked each non-compliance against each step of the process, referenced to the relevant section of the BSC, Balancing and Settlement Code Procedure document (BSCP) or CoP and counted as instances of non-compliance. You can see detail of these in Appendix 1 and an overview of results in Appendix 2. We also highlighted gap areas or weaknesses in the process; these are described in this section.

Timescales

As there were no timescales introduced to support the implementation of P283, there is no BSC mandated timeframe for:

- The LSDO to provide the Commissioning of measurement transformers documentation in a timely manner;
- The MOA to escalate any gap[4] in the process to the Supplier; and
- The Supplier to communicate with the LDSO/MOA to rectify the gap in the Commissioning process.

For the P283 process to work efficiently, we are reliant entirely on BSC Section L2.3.2 which requires that all reasonable endeavours be made by the Registrant to Commission the Metering Equipment before energisation. As the Registrant of the Metering System is the Supplier, it is its responsibility to ensure that both the LDSO and MOA has fully completed Commissioning.

MOA activities are also supported in BSCP514[5] Section 5.2.2.8 where it states that the MOA should install and Commission the HH Metering System (MS) in accordance with the appropriate CoP on the date requested or agreed in Section 5.2.2.5. If requested, the MOA may also be required to energise the Metering System and note the initial Meter register reading.

In the absence of timescales, for the TA check we used the first Settlement Run as a benchmark for what would be deemed a reasonable amount of time taken to action each step of the P283 Commissioning process. For example, for a site that has not been commissioned, a one month timescale past the point that the Metering System is energised. This is the date from which a site that is using energy will record data into Settlement, it takes 29 calendar days for the Registrant to be invoiced for any Trading Charges relating to that MPAN. The purpose of Commissioning is to ensure that the energy flowing across a Defined Metering Point is accurately recorded by the associated Metering System into Settlement. The consequence of the MOA (and/or LDSO and its Measurement Transformers) not Commissioning a site is that incorrect data could enter Settlement once the site starts to record energy if there are any issues. Commissioning is a control used to prevent issues with Current Transformers and Voltage Transformers (CT/VTs) which currently are an industry issue with around 42% of Trading Disputes resulting from CT/VT issues.

On review of the findings, there is clear evidence that timescales are needed for the P283 process to perform efficiently. The identification of the non-compliances raised across all Party and Party Agent roles was based on the amount of time taken for each of these activities as well as their absence. Without a timescale, there are no expectations set for each of these activities and the Party or Party Agent responsible is left to make its own judgement on what is deemed reasonable. At worst, it took 342 days for the LDSO to perform its Commissioning after energisation of the MPAN and the MOA 329 days to complete the Commissioning of a Meter following installation[6].

Commissioning

One of the changes introduced with P283 was the introduction of Commissioning by the LDSO. Where a BSC Party owns the Measurement Transformers, that Party shall be responsible for ensuring the requirements of CoP 4 5.5 are completed on its Metering Equipment up to and including the Testing Facilities. The MOA remains responsible of Commissioning the Meter and for ensuring that the Metering System complies with the requirements of the applicable CoPs. This includes the assessment of overall accuracy based on any evidence provided by other Parties

[4] This includes, where the LDSO has failed to pass part 1 Commissioning record and CT/VT Calibration Certificates to the MOA and where there is an omission or defect that have prevented the MOA from Commissioning.
[5] BSCP514: SVA Operations for Metering Systems Registered in SMRS
[6] The number of days have been calculated from either the Meter's installation or energisation date to the Commissioning date, or the Meter's installation or energisation date to the check visit date if not yet Commissioned.

in accordance with CoP4 – Namely the LDSO who is responsible for the Measurement Transformers. The only exception would be where the Measurement Transformers are not owned by a BSC Party, the sole responsibility for Commissioning all Meter Equipment would then rest with the MOA.

The findings have revealed that, of the total checked sample,[7] 52% of LDSO Metering Equipment had not been Commissioned and 49% of MOA Metering Equipment had not been Commissioned on the date of the check visit. This figure takes into account the one month timescale. For sites that had been Commissioned, the average number of days taken to complete Commissioning was 166 days for the LDSO and 143 days for the MOA.

During the first P283 TA check in February/March 2015, three LDSO businesses, covering six Grid Supply Point (GSP) Groups, told us that they were using Third Party contractors to install Metering Equipment. At the time of contracting these service providers, the contract agreements did not cover the Commissioning of the Measurement Transformers. All of the affected LDSOs assured us that they were working to rectify this shortfall in the P283 requirements.

For the recent check, LDSOs told us that they were still experiencing challenges with securing contracts with third party contractors to meet P283 obligations. This has prevented the Commissioning of Low Voltage (LV), High Voltage (HV) and Extra High Voltage (EHV) sites. One LDSO told us that this would not be rectified until 2016, one assured us that this was rectified as of September 2015 with the third already in place.

Both LDSOs and MOAs also told us that one reason for not Commissioning at the time of Metering Equipment install was that there was either low or no load available to perform the Commissioning tests. The MOAs and LDSOs concerned informed us that they had sufficient practices in place to dial the Meter at intervals to check for load, and once load was recorded then they would Commission. With the absence of timescales in some sections of the CoPs and BSCPs, both role types were comfortable with this practice and told us that the time taken to complete Commissioning was appropriate in all cases. Two LDSOs also told us that they were still not able to Commission either HV or EHV sites.

In some cases, MOAs Commissioned on the primary circuits as with pre-P283 practices rather than waiting for the LDSO Commissioning and using the LDSO evidence to complete the assessment of overall accuracy.

Commissioning records

CoP4 states that all Metering Equipment must be appropriately Commissioned and records maintained for each item of Metering Equipment for the life of that Metering Equipment.

It was evident from the findings that the CT/VT Calibration Certificates are still not being passed onto the MOA by the LDSO. This is in part a misunderstanding of the obligations and in part because they are simply not available through being lost, not passed on by the contractor or the MOA did not purchase them from the manufacturer at the same time as the Metering Equipment.

Both MOAs and LDSOs told us that they are experiencing issues with Independent Connections Providers (ICPs)[8] and Building Network Operators (BNOs)[9] in fulfilling their P283 communications obligations. A recent change in

[7] The total sample was 450 LDSO MPANs, 180 MOA MPANs and 60 Supplier MPANs.

[8] An ICP is an accredited company that is entitled to build electricity networks to the specification and quality required for them to be owned by either a LDSO or an IDNO.

[9] A BNO is as an organisation that owns or operates the electricity distribution network within a multiple occupancy building between the intake position and the customer's installation. The BNO may be an IDNO or a third party, exempt from holding an electricity distribution licence, such

competition of connections has provided an increase in the work that ICPs do. With ICPs and BNOs not being signed up to the BSC, they are also not tied into the obligation to maintain completed Commissioning records and CT/VT Calibration Certificates. Both LDSOs and MOAs have said that the majority of the time, they are not able to obtain these records from either an ICP or BNO

More than one MOA told us that they felt there was little value to retaining these records and that they perform adequate Commissioning and assessment of accuracy without them.

The requirement to maintain these records has not changed with the implementation of P283, yet there is still an issue with achieving this. A large number of Technical Assurance of Metering (TAM) checks still reveal a non-compliance (Category 2.15 Commissioning Records/2.16 Measurement Transformer Certificates not provided or incorrect) because of the absence of Commissioning records. This is a historical issue that is not improving.

MOAs told us that the Commissioning forms they are receiving from LDSOs are inconsistent and that they felt there was a lack of knowledge in regards to what should go on a Commissioning record. During the check ELEXON provided feedback and guidance to LDSOs on their Commissioning records and associated CoP 4 requirements where this had been observed.

Across all role types a small number of non-compliances were awarded because the Party or Party Agent was not able to provide evidence that they had performed their part of the process. Each Party had not maintained an audit trail or kept the email communications for viewing at a later date. During the check visits, ELEXON recommended that it would be best practice to keep an audit trail for future use and to demonstrate compliance to the CoP 4 obligations should this information be requested. There is an obligation to maintain records (Commissioning and CT/VT Calibration Certificates) for the lifetime of the Meter but no obligation to keep the communications sent between each Party and arty Agent.

Communication

LDSOs told us that in some cases they are receiving MOA requests for part 1 Commissioning documentation before they have installed the Measurement Transformers. However, the number of pre-P283 requests has dropped since the April 2015 check. One LDSO covering one GSP, told us that they had only received 80 requests for the part 1 Commissioning records and had installed Metering Equipment at 164 sites. The lack of MOA requests was not reflected across all LDSOs as most confirmed they had been receiving regular requests from the MOA.

MOAs told us that they still perceive a lack of communication from LDSOs. This was also reported in the April 2015 findings report. One MOA told us that since the implementation of P283, they had sent out 913 requests for the part 1 Commissioning records and it had only received 203 responses. There were similar findings across almost all MOAs.

Suppliers told us that the MOA communications are not consistent across all Party Agents. Suppliers have said they themselves do not have the technical knowledge to perform an accurate assessment on a site that has not been Commissioned, so are entirely reliant on the MOA to provide the relevant information. Suppliers also said that they would like to receive notifications from the MOAs advising on the status of an MPAN, its risk level if not Commissioned, any action that is required and where they need to escalate a gap in the Commissioning process to a System Operator.

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as a facilities management company. The LDSO will only be responsible for providing a service cable from the LV distribution network to the intake position.

The MOA is also required under CoP 4 to notify the Registrant, via an auditable, electronic method, that either all items of Metering Equipment have been fully and successfully Commissioned in accordance with this CoP4; or that there are defects or omissions in the completion of the processes which has the potential to affect Settlement. Suppliers told us this is not happening in all cases. One Supplier told us that since the implementation of P283, it has received 17 escalations and only 9 notifications of completion. The total number of new connections is around 170-200 sites.

Suppliers told us that they have good relationships with their customers so are able to help resolve some of the reasons why the LDSO and MOA have not been able to Commission (for example no access). Suppliers told us that in some cases it is not obvious from the MOA communications which sites have been Commissioned, which have defects and which the MOA is escalating for non-receipt of CT/VT Certificates. Often, the MOA sends a list of all sites on one email as a table of MPANs and their status. The risk level indication is also not consistent across all MOAs, what one MOA deems as low risk another will mark as a high risk non-Commissioned site. The Supplier is then unsure of what the risk is to each site and cannot efficiently prioritise action.

One Supplier told us that Data Flows were being used by MOAs to communicate the notification of Commissioning status. Although the notification is required to be an auditable, electronic method, the use of a Data Flow created for a different process will not produce a clear enough communication. Suppliers are expecting an email so will not be looking for notifications via the Data Flow. This could cause a request for action by the MOA to be overlooked.

Following the April 2015 TA check findings report, ELEXON published a P283 contact list hosted on the ELEXON Portal to provide up to date contact information for all Parties and Party Agents involved in HH Commissioning. We have populated this using information given to us by the relevant Parties/Party Agents with regular requests for updated details through the Operational Support Managers (OSMs) and the BSC website. Most Parties and Party Agents are using this contact list so when requests are made, the correct department will be receiving the information.

Modification P283

LDSOs told us that in some cases they are receiving MOA requests for part 1 Commissioning documentation before they had installed the Measurement Transformers. The feedback from most LDSOs and MOAs was that the P283 process is not working. There was a general low morale across these Parties/Party Agents around the processes involved to perform their obligations. We witnessed a mixture of not understanding the process, not being aware of parts of the process and not believing in the process. One Party also told us that they thought the P283 guidance document was not clear enough to be understood.

Despite the highlighted non-compliances, where the whole end to end process has been followed by all Party types as per the obligations, the process fulfils the intention of P283.

We have observed that the teams that deal with this process are quite small (2-3 full time equivalent (FTE) generally) so there is still a large backlog for many Parties and Party Agents.

NEXT STEPS

Improving the HH Commissioning process

Section L 'Metering' 2.3.2 states that "In relation to any new SVA Metering System, the Registrant shall use all reasonable endeavours to ensure that Metering Equipment is installed and commissioned in accordance with paragraph 2.1.1(a) before the registration of the Metering System becomes effective."

Many of the non-compliances (for both LDSOs and MOAs) were related to MPANs that had not yet been Commissioned. The primary reasons given were relating to there being a low or insufficient load. There are a number of different ways to perform Commissioning, for example through injection testing or asking the customer

temporarily increase their output to create a higher load. Whilst we are sympathetic to additional costs that may be involved, the BSC and CoPs state that the Metering Equipment is Commissioned and reasonable endeavours are made to do so.

We believe that leaving a site not Commissioned in extreme cases for up to 11.4 months does not show that reasonable endeavours have been made to perform Commissioning. This itself presents a risk to Settlement. The Commissioning process is designed specifically to prove the accuracy of Metering Systems and will detect any inherent Metering problems that would otherwise not be identified. Therefore any failure in this process has the potential to mask very significant issues that may not be detected until much later when data has already entered Settlement.

The BSC is not prescriptive for how an LDSO or MOA performs Commissioning, only that it is performed. However we feel that a further understanding of the barriers to completing Commissioning needs to be obtained in order to assess this further and ensure that any change we make to the Commissioning process is realistic and achievable.

CT/VT Calibration Certificates

ELEXON is currently engaging with the Technical Assurance of Metering Expert Group (TAMEG) to look as ways of resolving the issue of absent CT/VT Calibration Certificates. An initial discussion was held in November 15 to clarify what the issue is and what possible alternatives for assurance there may be. However, what the solution may look like has yet to be decided. The next TAMEG meeting will take place in January 2016 to discuss next steps with possible papers to the Imbalance Settlement Group (ISG)/Supplier Volume Allocation Group (SVG) and the PAB.

ELEXON also currently has an open action from the PAB to look into the feasibility of a central repository for Commissioning records so we could potentially also include Calibration certificates.

Both of these pieces of work will be a focus for 2016, but until then Parties will be required to obtain and keep hold of these records.

Timescales

In April 2015, it was recommended that ELEXON and the TAMEG investigate attaching timescales to the P283 Commissioning process. As the P283 Commissioning process is in scope for the BSC Audit from 2015/16, we believe that timescales are not only essential for the efficient working of the process but also necessary for the BSC Auditor to track future non-compliances in the Commissioning of HH Metering Systems. The need for defined timescales has been supported by the recent findings.

In September 2015, we invited interested Parties and Party Agents from the previous P283 guidance review group to look at drafting timescales for BSCP514 and BSCP515[10]. The group consisted of representatives from Suppliers, MOAs, and LDSOs. A follow up meeting will take place after the completion of this P283 check to review this initial draft of the proposed timescales, the findings from this check and any other recommendations from the PAB following this report.

Data Flow

In April 2015, there was a recommendation by the P283 guidance workgroup that the Data Transfer Network should be used to communicate Commissioning information from the LDSO to the MOA and from the MOA to the Supplier. This could be accomplished by the creation of a new Data Flow, or by adapting an existing Data Flow. We

[10] BSCP515 Licensed Distribution

recommend that we feed this idea into the TAMEG for consideration along with the introduction of the proposed timescales.

For the P283 process to work effectively, we are reliant entirely on BSC Section L (Metering) 2.3.2, which requires that all reasonable endeavours be made by the Registrant to commission the Metering Equipment before energisation, and on the fact that as the Registrant of the Metering System, the responsibility is with the Supplier to ensure that Commissioning has been fully completed.

We recommend that ELEXON and the TAMEG continue with this along with the work to introduce timescales.

Commissioning Forms

We discovered during the check that there was a great deal of inconsistency between the Commissioning forms that LDSOs produce. There were also some queries from LDSOs about what was required in the record. We feel it would be helpful to industry to introduce a template Commissioning record that can be used as guidance by LDSOs. This would be a temporary solution while ELEXON investigates the feasibility of a Data Flow for part 1 Commissioning documentation.

Education

We recommended that MOAs, System Operators and Suppliers attend some refresher training/education on the P283 obligations, particularly in the following areas:

- Overview of the whole P283 process and knowing where their role fits in the process;
- Responsibilities of each Party/Party Agent;
- P283 process for new connections versus upgraded CT/VTs;
- Knowing who and when to ask for a Measurement Transformer Commissioning record (e.g. requesting Commissioning record from an LDSO for Metering Equipment installed prior to 6 November 2014); and
- What is expected in a Commissioning record;

ELEXON will provide the training and we intend to hold another P283 education event as needed when any of the next steps have been decided and are progressing.

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SUMMARY

During the checks carried out in quarter one of 2015 and results presented in April 2015, 13 out of the 16 System Operators were judged to be compliant with the process, in part because they had not been asked by the MOA to provide a Commissioning record for the MPANs chosen for sample. This was supported by the fact that 8 out of 11 HHMOAs were non-compliant with the process because they had not requested the Commissioning records from System Operators for the MPANs chosen for sample. All Suppliers were found compliant, simply because they had not yet received any escalations from the MOA.

This P283 TA checks showed a 100% overall non-compliance rate across all Parties (LDSO, MOA and Supplier) with the P283 obligations. At the time of the check, the P283 process had been in operation almost 12 months. Details of where these obligations lie on the P283 process are detailed din Appendix 2 of this findings report.

Successes

Despite there being a large number of non-compliances highlighted the P283 process is working, just not in all cases.

P283 was created to resolve the issue of CTs and VTs, which was provided by the relevant Transmission or Distribution System Operator. Such Metering Equipment, especially in the case of HV supplies, will often be installed before a MOA has been appointed. Due to operational safety issues and potential disruption to customers later on, the MOA would then lose the opportunity to Commission this Metering Equipment and therefore confirm the accuracy of the Metering System. P283 has achieved this now that the LDSO is able to Commission its own equipment. This now brings us back to the questions around timescales.

We saw encouraging evidence that all Parties/Party Agents involved had been working to integrate new practices for following the P283 process, and in most cases that process was in place before our check visit. Both the LDSOs and MOAs are able to identify the MPANs that fall under the scope of P283 and to take appropriate action on them with only two that had areas of improvements. Within each role type there is a wealth of technical knowledge which was evident through our visits and discussions with each Party/Party Agent. We are confident that there is sufficient skill and ability to Commission, Commission correctly and identify records when passed from one Party/Party Agent to the next. The primary issue with Commissioning is again, the timescales. This will be addresses with the actions that are created from the next steps.

We must address the practicalities of the process, namely the communications of each Party/Party Agent and with the passing of paper records. This is not a process fit for purpose given the technology available and is resource intensive, costly, unreliable and evidently too prone to error. This was also identified in the April 2015 findings report.

Concerns

During the course of the TAPAP checks, there were two main concerns raised:-

1. That Commissioning is not completed until sometime after the installation date (during which time majority of the MPANs were energised): and
2. That communication between each Party/Party Agent is not being done.

We also recognise that many companies have made genuine attempts to introduce new processes but either through not understanding the Commissioning obligations, the misunderstanding the communications obligations or due to the laborious nature of passing records the process was not followed.

This is a concern as we are now more than 12 months after implementation. We feel that this process should now be a fully integrated process to fulfil the new obligations introduced by P283. Considering we performed a check so early after implementation and that we provided a feedback to enable Parties and their Party Agents to refine internal processes, we expected that the results would have been more positive. Therefore, it is a concern that so many non-compliances have been highlighted.

We also know from the P283 TAM checks that there is Metering Equipment installed and not commissioned. While most Parties and Party Agents are proactively trying to rectify this in a timely manner, for commercial reasons not all Parties or Party Agents are able to do this.

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APPENDIX 1: NON-COMPLIANCES

Where the LDSO/IDNO was found to fall down on one part of the process, each instance of non-compliance was marked against Code of Practice 4 and it's relevant obligations:

- The Licensed Distribution System Operator (LDSO) has not yet completed Commissioning the current transformer (CT)/voltage transformer (VT). This presents a risk to Settlement should there be an issue with the installation of the equipment. This is a failure to act in accordance with Code of Practice (CoP4), section 5.5:

  "Where measurement transformers are owned by a BSC Party that Party shall be responsible for ensuring the requirements of 5.5, are performed on its Metering Equipment up to and including the Testing Facilities. In addition that Party shall prepare, and make available to the appointed MOA, complete and accurate Commissioning records in relation to these obligations."

- The Licensed Distribution System Operator (LDSO) has not provided Commissioning records and current transformer (CT)/voltage transformer (VT) Calibration Certificates to the Meter Operator Agent (MOA). This is a failure to act in accordance with Code of Practice (CoP4), section 5.5:

  "Where measurement transformers are owned by a BSC Party that Party shall be responsible for ensuring the requirements of 5.5, are performed on its Metering Equipment up to and including the Testing Facilities. In addition that Party shall prepare, and make available to the appointed MOA, complete and accurate Commissioning records in relation to these obligations."

Where the MOA was found to fall down on one part of the P283 process, each instance of non-compliance was marked against Code of Practice 4 and BSCP 514 and it's relevant obligations:

- Meter Operator Agent (MOA) did not request Commissioning records and current transformer (CT)/voltage transformer (VT) Certificates from the Licenced Distribution System Operator (LDSO). This is a failure to act in accordance with Code of Practice 4 (CoP4), section 5.5:

  "(…) it shall be the responsibility of the relevant MOA to ensure that the Metering System complies with the requirements of the applicable CoPs including the assessment of overall accuracy based on any evidence provided by other Parties in accordance with CoP4".

- Meter Operator Agent (MOA) did not escalate non-receipt of Commissioning records and current transformer (CT)/voltage transformer (VT) Certificates from the Licenced Distribution System Operator (LDSO) to the Supplier. This is a failure to act in accordance with Code of Practice 4 (CoP4), section 1:

  "In the case of Half Hourly Metering Equipment it shall be the responsibility of the MOA to notify its Registrant, via an auditable, electronic method, that (…)

  • There are defects or omissions in the completion of the processes set out in this CoP4 which have the potential to affect Settlement Evidence"

- Meter Operator Agent (MOA) did not inform the Supplier that Commissioning could not be completed and that there was an omission or defect. This is a failure to act in accordance with Code of Practice (CoP4), section 1:

  "In the case of Half Hourly Metering Equipment it shall be the responsibility of the MOA to notify its Registrant, via an auditable, electronic method, that (…)

  • There are defects or omissions in the completion of the processes set out in this CoP4 which have the potential to affect Settlement"

- Meter Operator Agent (MOA) did not inform the Supplier that Commissioning had been successfully completed. This is a failure to act in accordance with Code of Practice (CoP4), section 1:

  "In the case of Half Hourly Metering Equipment it shall be the responsibility of the MOA to notify its Registrant, via an auditable, electronic method, (…)

  • All items of Metering Equipment have been fully and successfully Commissioned in accordance with this CoP4;"

- Meter Operator Agent (MOA) has not yet completed Commissioning, which presents a risk to Settlement should there be an issue with the installation of the Metering Equipment. This is a failure to act in accordance with Code of Practice 4 (CoP4), section 5.5:

  "(…) it shall be the responsibility of the relevant MOA to ensure that the Metering System complies with the requirements of the applicable CoPs including the assessment of overall accuracy based on any evidence provided by other Parties in accordance with CoP4".

  and BSCP 514, 5.2.2.8;

  "On the date requested by or agreed with the Supplier, Install and Commission HH MS in accordance with appropriate Codes of Practice"

- Meter Operator Agent (MOA) did not correctly inform the Supplier regarding the Commissioning status. This is a failure to act in accordance with Code of Practice 4 (CoP4), section 1:

  "In the case of Half Hourly Metering Equipment it shall be the responsibility of the MOA to notify its Registrant, via an auditable, electronic method, that either:

  • All items of Metering Equipment have been fully and successfully Commissioned in accordance with this CoP4; or that

  • There are defects or omissions in the completion of the processes set out in this CoP4 which have the potential to affect Settlement"

Where the Supplier was found to fall down on one part of the process, each instance of non-compliance was marked against Code of Practice 4 and it's relevant obligations:

- The Supplier has not acted on an escalation from the Meter Operator Agent (MOA) where Commissioning records and current transformer (CT)/voltage transformer (VT) Certificates have not been received by the Licensed Distribution System Operator (LDSO). This is a failure to act in accordance with Code of Practice (CoP4), section 1:

  "It shall be the responsibility of the Registrant to ensure that all Metering Equipment is appropriately Commissioned and records maintained for each item of Metering Equipment for the life of that Metering Equipment in accordance with this CoP4."

APPENDIX 2: TABLE OF RESULTS

LDSO non-compliances

	Total no. instances of non-compliances	LDSO has not yet completed its Commissioning or Commissioned to reasonable timescales	LDSO did not pass part 1 to MOA when requested	LDSO did not pass complete part 1 to MOA when requested
LDSO 1	36	30	6	0
LDSO 2	14	7	7	0
LDSO 3	14	7	7	0
LDSO 4	6	5	1	0
LDSO 5	3	2	0	1
LDSO 6	36	20	14	2
LDSO 7	42	22	15	5
LDSO 8	24	16	5	3
LDSO 9	35	23	12	0
LDSO 10	28	19	9	0
LDSO 11	34	17	11	0
LDSO 12	35	25	10	0
LDSO 13	30	30	0	0
LDSO 14	30	30	0	0
LDSO 15	14	1	5	8
Total	381	254	102	19

MOA non-compliances

	Total no. instances of non-compliances	MOA did not request part 1 from LDSO	MOA did not escalate non-receipt of part 1 to Supplier	MOA has not yet completed its Commissioning
HHMOA 1	36	7	8	12
HHMOA 2	60	17	16	20
HHMOA 3	35	10	10	0
HHMOA 4	74	8	14	20
HHMOA 5	54	8	24	12
HHMOA 6	71	25	26	19
Total	330	75	98	83

	MOA did not notify Supplier of defect/omission	MOA did not inform Supplier Commissioning was complete	MOA did not correctly inform the Supplier of the site status
HHMOA 1	4	0	5
HHMOA 2	5	2	0
HHMOA 3	11	0	4
HHMOA 4	22	2	8
HHMOA 5	0	0	10
HHMOA 6	0	0	1
Total	42	4	28

Supplier non-compliances

	Total no. instances of non-compliances	Supplier has not acted upon MOA escalation of non-receipt of part 1
Supplier 1	7	7
Supplier 2	4	4