

CP Consultation Responses



CP1433 'Clarification of which Metering Systems are captured by the P272 requirements'

This CP Consultation was issued on 9 March 2015 as part of CPC00754, with responses invited by 2 April 2015.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
TMA Data Management Ltd	0/4	HHDA, HHDC, NHHDA, NHHDC
IMServ Europe	0/3	HHDA, HHDC, HHMOA
ScottishPower	5/13	Distributor, Generator, Supplier, Supplier Agents
Electricity North West Ltd	0/1	SMRA
SSE Energy Supply Limited	4/6	Supplier, NHHDC, NHHDA, NHHMOA
British Gas	5/0	Supplier
RWE npower Ltd	7/14	Generator, Supplier, Supplier Agent
Stark Software International Ltd	0/4	HHDA, HHDC, NHHDA, NHHDC
EDF Energy	5/14	Generator, Supplier, Consolidator, ECVNA, MVRNA, CVA MOA, HHDA, HHDC, HHMOA, NHHDA, NHHDC and NHHMOA

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
TMA Data Management Ltd	✓	✗	✗	✓
IMServ Europe	✓	✗	✗	-
ScottishPower	✓	✗	✗	✓
Electricity North West Ltd	✓	✗	✗	✓
SSE Energy Supply Limited	✓	✓	✓	✓
British Gas	✓	✗	✗	✓
RWE npower ltd	✓	✓	-	✓
Stark Software International Ltd	✗	✗	✗	✓
EDF Energy	✗	✓	✓	✓

Question 1: Do you agree with the CP1433 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
7	2	0	0

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	
IMServ Europe	Yes	
ScottishPower	Yes	ScottishPower welcome the intent of the proposal to provide clarity on this area. We believe that this change provides clarity on the associated profile classes attributable to the P272 Change effective from 01/04/16.
Electricity North West Ltd	Yes	The clarification of which metering systems P272 will impact is a useful addition and should improve the overall migration process.
SSE Energy Supply Limited	Yes	-
British Gas	Yes	-
RWE npower Ltd	Yes	-
Stark Software International Ltd	No	<p>Electricity tariffs pre-1994</p> <p>Pre-1994, general practice was for the larger supplies to be charged on Seasonal Time of Use Maximum Demand based tariffs. Given that maximum demand is a prerequisite for calculating load factor (see 'Load Profiles and their use in Electricity Settlement' Elexon, Version 2.0, 7 November 2013) 1, it is the larger supplies that populated Profile Classes 5-8.</p> <p>Ofgem and DECC have consistently associated profile class solely with size. This is obviously wrong. The correct association is that profile class is linked to the ability to calculate load factor.</p> <p>CP1433</p> <p>In CP1433 the author claims:</p> <p>"The original requirements for ensuring that the MD was recorded were due to an associated tariff,</p>

Respondent	Response	Rationale
		<p>which is now no longer charged.”</p> <p>Contrary to the above statement, in ‘Load Profiles and their use in Electricity Settlement’ Elexon tells us that:</p> <p>“In order to avoid the huge and prohibitive costs of putting Half-Hourly metering into every supply market customer, it was decided that customers below 100 kW Maximum Demand would be settled using load profiles and readings from customers’ existing electricity meters.”</p> <p>Profile Classes 3-4 contain many high load factor supplies but because it wasn’t the practice to measure maximum demand on smaller supplies, post 1994 these supplies were dumped into Profile Classes 3 and 4.</p> <p>BSCP516</p> <p>The author of CP1433 has correctly drawn our attention to the crux of the problem, that is, BSCP516 v7.0 states that the method of allocating a Profile Class is dependent on whether, among other things, “Maximum Demand (MD) is recorded”.</p> <p>Rollout of advanced meters</p> <p>Over the last four years, some hundreds of thousands of CoP10 approved advanced meters have been installed in NHH Profile Class 3-4 sites. Is Maximum Demand being recorded in any these meters? We believe that it is being recorded in many if not all of these meters.</p> <p>Paragraph 4.1.2, Procedure 5 of BSCP516 states that:</p> <p>“Import Metering used for Non-Domestic purposes where MD is recorded must be allocated to one of the MD Load Factor Banded Profile Classes.”</p> <p>Conclusion</p> <p>P272 correctly abandons the artificial notion of profile class. In our opinion, CP1433 fails to make the case that CoP10 advanced meters in Profile Classes 3-4 are ‘out of scope’. The measurement of maximum demand in existing NHH advanced meters is the determining factor.</p> <p>Notwithstanding the magnitude of project, suppliers need to grasp the nettle; irrespective of whether or not demand is being recorded, all NHH sites with</p>

Respondent	Response	Rationale
		CoP10 advanced meters should automatically be migrated to the Half Hourly market.
EDF Energy	No	<p>We do not believe the solution provides the required clarity with respect to what Metering Systems are captured under P272. We would prefer that physical characteristics such as whether the site is Current Transformer metered, the Maximum Import Capacity that applies would give parties the clarification required.</p> <p>What is not clear is how a Supplier would guarantee whether there is, or was, a requirement for Maximum Demand to be recorded for distribution charging, and also to determine the basis of that requirement. This provides uncertainty not only for those that would require to be assigned a Profile Class 5 to 8 but also those that would now no longer be captured under the requirements as will fall under Profile Class 3 to 4. We would expect corresponding rules in DCUSA with respect to notice of requirement for Maximum Demand to aid certainty for the period leading up to 1st April 2016.</p> <p>Our understanding is that if a Distribution Company requires Maximum Demand prior to 1st April 2016 a Profile Class 5 to 8 will be allocated and therefore be captured under the requirements for half-hourly settlement. Therefore any new Metering System which required Maximum Demand prior to 1st April 2016 would be assigned a Profile Class 5 to 8, but post 1st April 2016 would not, which is inconsistent.</p>

Question 2: Do you agree that the draft redlining delivers the CP1433 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
7	2	0	0

Responses

A summary of the specific responses on the draft redlining can be found at the end of this document.

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	
IMServ Europe	Yes	
ScottishPower	Yes	<p>While we agree the draft redlining reflects the proposed solution we note that SLC 12.19 defines an advanced meter as</p> <p>"...an Electricity Meter that, either on its own or with an ancillary device, and in compliance with the requirements of any relevant Industry Code:</p> <p>a) provides measured electricity consumption data for multiple time periods, and is able to provide such data for at least half-hourly time periods; and</p> <p>b) is able to provide the licensee with remote access to such data."</p> <p>Further clarification on this area was provided by Ofgem during the Issue 59 Workgroup and we believe it would provide additional clarity if this is specifically referenced in BSCP516.</p>
Electricity North West Ltd	Yes	-
SSE Energy Supply Limited	Yes	-
British Gas	Yes	-
RWE npower ltd	Yes	-
Stark Software International Ltd	No	<p>The redlining does not make it clear what happens to new NHH meters that are installed post P272. Also as stated above, the redlining hides behind the current ambiguity of "Standard Licence Condition (SLC) 12.17-12.22" that puts an arbitrary ring fence</p>

Respondent	Response	Rationale
		around a particular cohort of meters.
EDF Energy	No	As noted in question 1, given the importance of allocation of Profile Classes we believe it is materially significant for this to be detailed within the BSC or at least more explicitly within the BSCP.

Question 3: Will CP1433 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
3	6	0	0

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	No	-
IMServ Europe	No	The proposed change aligns with what we do already therefore this has no impact.
ScottishPower	No	We do not believe that CP 1433 will result in any impact on our organisation, as the intention is to provide clarity to all parties on the relevant profile classes to be utilised under the new P272 regime, and for us will not in itself result in changes. The impacts on us have been documented in previous responses to P272.
Electricity North West Ltd	No	We are not expecting to make any changes to our systems as a result of this CP.
SSE Energy Supply Limited	Yes	-
British Gas	No	-
RWE npower Ltd	Yes	This would impact in only that it is setting out to define which metering systems are covered under P272 i.e. after 1st April 2016 (or maybe 2017 if delay goes through) any non-domestic customer with an advanced meter are mandated to be settled Half Hourly rather than registered as PC05-08.
Stark Software International Ltd	No	-
EDF Energy	Yes	We believe there is still uncertainty that needs to be clarified in order to fully assess impact internally.

Question 4: Will your organisation incur any costs in implementing CP1433?

Summary

Yes	No	Neutral/No Comment	Other
2	6	1	0

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	No	-
IMServ Europe	No	-
ScottishPower	No	As above, we do not anticipate any changes as a result of this Change (all costs have been documented in the P272 responses).
Electricity North West Ltd	No	-
SSE Energy Supply Limited	Yes	-
British Gas	No	-
RWE npower Ltd	-	-
Stark Software International Ltd	No	-
EDF Energy	Yes	We are unable to provide costs at this stage as we believe there is still ambiguity with respect to which Metering Systems are captured under P272 requirements.

Question 5: Do you agree with the proposed implementation approach for CP1433?

Summary

Yes	No	Neutral/No Comment	Other
8	0	1	0

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	-
IMServ Europe	N/A	No view
ScottishPower	Yes	We agree that the change should be implemented as soon as is practicable, as this is anticipated to provide clarity ahead of the implementation on P272.
Electricity North West Ltd	Yes	The implementation date of 25 June 2015 seems reasonable. However, this may be impacted when the Authority makes its decision on whether to delay the implementation of P272 from 1 April 2016 to 1 April 2017. If the date changes (as a consequence of an Authority decision) prior to SVG approval the CP may need to be revisited to change the date contained in the various legal text which may defer the implementation.
SSE Energy Supply Limited	Yes	-
British Gas	Yes	-
RWE npower Ltd	Yes	-
Stark Software International Ltd	Yes	-
EDF Energy	Yes	-

Question 6: Do you have any further comments on CP1433?

Summary

Yes	No
1	8

Responses

Respondent	Response	Comments
TMA Data Management Ltd	No	-
IMServ Europe	No	-
ScottishPower	No	-
Electricity North West Ltd	No	-
SSE Energy Supply Limited	No	-
British Gas	No	-
RWE npower ltd	No	-
Stark Software International Ltd	Yes	<p>[We do not agree] 'that the requirement for HH metering should be based on size'. Load factor has nothing to do with size. That is why there is no reference to 'size' in BSCP516.</p> <p>BSCP516 is very clear; if maximum demand is being recorded then load factor can be calculated. Load factor cannot be calculated in the absence of a maximum demand value. In the absence of a maximum demand value, sites are automatically dumped into either PC3 or PC4.</p> <p>We [agree] 'that if the Metering System is CoP 10 and in PC 3 or 4 with MD recorded then they should be in PC 5 to 8'.</p> <p>In PCs 3-4 there are perhaps 300,000 or more advanced meters installed where maximum demand is being recorded. Therefore, a load factor can be calculated and the correct profile class attributed to the supply. The question that needs to be asked is why, in accordance with BSCP516, has this not already been done?</p> <p>However, P272 has made load factor based classes redundant and mandated that these supplies be migrated to the Half Hourly market. If you are</p>

Respondent	Response	Comments
		<p>willing to entertain the thought that every CoP10 advanced meter in PC3-4 is recording maximum demand, then it follows that, in accordance with P272, all of these meters must go Half Hourly with effect from April 2016 or from whichever date Ofgem mandates.</p> <p>There is no justification or requirement to amend [BSCP]516. It is my belief that the proposed amendments are simply a tortuous attempt to put this set of meters out of scope and thereby save suppliers the aggravation of having to include them in the P272 programme.</p>
EDF Energy	No	-

Insert CSD Here

Respondent	Location	Comment

Insert CSD Here

Respondent	Location	Comment

Insert CSD Here

Respondent	Location	Comment

Respondent	Location	Comment