Final CP Report

CP1439 'Proving Test Permissible Software'

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About This Document

This document is the Change Proposal (CP) Final Report for CP1439 which ELEXON has published following the final decision from the Supplier Volume Allocation Group (SVG) to approve CP1439.

There are four parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, and proposed implementation approach. It also summarises the SVG's views on the proposed changes and the views of respondents to the CP Consultation, along with the final decision on whether to approve this change.
- Attachments A and B contain the approved redlined changes to deliver the CP1439 solution.
- Attachment C contains the full responses received to the CP Consultation.

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1 Why Change?

Current arrangements

The Change of Measurement Class (CoMC) process from Non Half Hourly (NHH) to Half Hourly (HH) requires a proving test to take place. BSC Procedure (BSCP) 502 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS' and BSCP514 'SVA Meter Operations for Metering Systems Registered in SMRS' list four different methods for carrying out proving tests. 'Method 4' allows the HH Meter Operator Agent (MOA) to use the Meter manufacturer's software to read information from the Meter as part of the proving test.

What is 'Method 4'?

Under 'Method 4' the MOA installs / reconfigures the Metering System (MS) and commissions the MS and records the HH Metered Data reading while on site. The HHDC collects data for the HH Settlement Period of its own choosing and sends this to the MOA. The MOA then uses the manufacturer's software to read the Meter constants, pulse multiplier, serial number etc. It then collects Meter pulses or engineering data for the same HH Settlement Period as provided by the HHDC and calculates the reading.

What is the issue?

The Meter manufacturer software only allows for one Metering System to be dialled at a time. This makes carrying out proving tests for a large number of Metering Systems a time-consuming and laborious process. The Proposer of CP1439 believes that this inefficiency needs resolving before the implementation of P272 'Mandatory Half Hourly Settlement for Profile Classes 5-8', which will require significant volumes of CoMC.

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2 Solution

Approved solution

CP1439 'Proving Test Permissible Software' was raised by SmartestEnergy Limited. It will amend BSCP502 and BSCP514 to allow the HHMOA to also use other BSCP601 'Metering Protocol Approval and Compliance Testing' approved software during the proving test process.

HH Data Collectors (DCs) have other software that they can use to read the required information from Meters. This software undergoes the protocol approval process in BSCP601 to ensure that it acts in the same way as the Meter manufacturer software when collecting data from Meters. This software can be tasked with dialling Meters in batches rather than individually. Using this software will allow batches of proving tests to be undertaken more quickly. It will therefore facilitate the efficient implementation of P272.

Approved redlining

Attachments A and B contain the approved redlined changes to BSCP502 and BSCP514 to deliver CP1439.

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3 Impacts and Costs

Central impacts and costs

Central impacts

CP1439 will require updates to BSCP502 and BSCP514 to implement the proposed solution. No system changes will be required for this CP.

Central Impacts	
Document Impacts	System Impacts
• BSCP502 • BSCP514	• *None*

Central costs

The central implementation costs for CP1439 will be approximately £240 (one man day) for ELEXON to implement the relevant document changes. There are no BSC Agent costs or impacts.

BSC Party & Party Agent impacts and costs

Participant impacts

CP1439 will impact HHMOAs.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
HHMOAs	Changes will be required to implement the solution.

Three of the 11 CP Consultation respondents indicated that CP1439 would impact them. Two respondents commented that the change in its current form would increase the risk of incorrect proving occurring and that the proving test process itself would no longer be beneficial. One respondent highlighted that the CP would allow it to perform proving activities more efficiently. However, they stated that they would only support the change if it maintained the objectives and independence of the proving test process.

The remaining eight respondents did not identify any impacts associated with CP1439.

Participant costs

Two of the 11 respondents indicated that there would be costs associated with CP1439. One respondent commented that the proposed solution would allow its MOA business to utilise the dialling software used by the HHDC business and therefore processes would need to be reviewed and redesigned. The other respondent commented that there may be costs involved but the extent of these is unknown.

The remaining nine respondents did not identify any costs associated with CP1439.

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4 Implementation Approach

Approved Implementation Date

CP1439 has been approved for implementation on **5 November 2015** as part of the November 2015 BSC Systems Release.

Suppliers are likely to start the CoMC process for P272 affected Meters in earnest in November 2015 with the implementation of Approved Modification P300 'Introduction of new Measurement Classes to support Half Hourly DCUSA Tariff Changes (DCP179)', and the mandatory start date for migration under Approved Modification P322 'Revised Implementation Arrangements for Mandatory Half Hourly Settlement for Profile Classes 5-8'. The majority of the Meters affected by P272 will not undergo a CoMC process prior to the implementation of P300 as Suppliers will want to use the new P300 Measurement Classes.

Nine of the 11 CP Consultation respondents agreed with the proposed CP1439 Implementation Date, which aligns with the P300 Implementation Date and the start of the P272 CoMC processes. Two respondents disagreed, noting that this change has been raised to address concerns regarding high volumes during the P272 CoMC period. However, they believed the change would introduce an ongoing risk to Settlement as it allows the proposed approach to be used for any NHH to HH CoMC.

5 Initial Committee Views

SVG's initial views

The SVG considered CP1439 at its meeting on 28 April 2015 (SVG171/07).

An SVG Member requested that the redlined changes to BSCP514 are also reflected in BSCP502. ELEXON advised that, following the SVG papers being issued for the April meeting, it had identified that these changes should be made and had updated the draft redlining.

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6 Industry Views

This section summarises the responses received to the CP Consultation. You can find the full responses in Attachment C.

Summary of CP1439 CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1439 proposed solution?	8	3	0	0
Do you agree that the draft redlining delivers the intent of CP1439?	10	1	0	0
Will CP1439 impact your organisation?	3	7	1	0
Will your organisation incur any costs in implementing CP1439?	2	9	0	0
Do you agree with the proposed implementation approach for CP1439?	9	2	0	0
Do you have any further comments on CP1439?	2	9	0	0

Comments on the CP

Respondents to the CP Consultation unanimously agreed with the rationale for the CP. However, only eight of the 11 respondents agreed with the proposed changes for CP1439. These eight respondents commented that the change will allow HHMOAs to be more efficient in performing proving tests in the run-up to the implementation of P272. They considered that this will maintain the accuracy of the proving test while allowing more flexibility in what software can be used.

Three respondents disagreed with the proposed changes. They commented that, although they agree that there is an issue with the volumes of proving tests required for P272, they did not agree with the solution proposed.

Is there a risk of the MOA and HHDC using the same software?

Two respondents highlighted that the principle objective of the proving test is to ensure that:

- the metering details in the Meter Technical Details (MTDs) provided to the HHDC match up with those in the Meter; and
- the HHDC has applied the MTDs correctly to enable retrieval of correct consumption values.

In order to achieve this objective, the respondents noted that the MOA needs to use software in their test which is not reliant on the information contained within the MTDs. This is because the MTDs may contain an error. The MOA needs to obtain the actual values recorded by the Meter, unaffected by any potential errors introduced in either documenting the Meter set-up in the MTDs or applying these in the software.

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These respondents were concerned this CP would result in many instances of the MOA and HHDC using either the same single business instance of software to perform their individual responsibilities in the proving test process, or the same version of software. The respondents commented that this would remove the required independence. In these situations, both the MOA and HHDC would retrieve the same value (indicating a successful proving test) but this value may actually be incorrect. The Proposer of CP1439 contended that the chances of this occurring are small and noted that the risk already exists now. They also highlighted that the CP does not change the HHDC's and MOA's existing separate responsibilities to prove Metering Systems.

Is there a risk of negating the benefit from Meter proving?

These respondents were also concerned that there is a risk that the MOA uses the same information as provided to the HHDC, negating the benefit from Meter proving. They believed that HHDCs will rely on the information provided in the D0268 'Half Hourly Meter Technical Details' data flow to determine which pulse multiplier to apply to the data they retrieve from the Meter. ELEXON clarified with these respondents that this is not the case, as this would be inconsistent with BSCP502. The MOA should provide the pulse multiplier in the MTDs and the HHDC must not alter this.

These respondents also noted that if an MOA used software approved for use by the HHDC under BSCP601, then this would simply duplicate what the HHDC had already done and would effectively prove nothing. The respondents commented that, in some cases, this CP would make a proving test meaningless as the information would always match between the HHDC and the MOA.

The Proposer of CP1439 contended that this CP does not alter the obligations (detailed above) on the HHMOA or HHDC. They noted that the D0268 data flow is proven as long as the HHDC uses the D0268 to obtain the data, the MOA confirms that this data is correct and the MTD parameters are checked and correct. They also highlighted that BSCP601-approved software is proven to be identical functionally to the manufacturer's software. The Proposer therefore noted that the CP does not change any principle or responsibility, but simply allows the use of more sophisticated software that is equivalent functionally to the manufacturer's.

Use of Method 3 wording

The other respondent who disagreed with the CP supported the principle of extending the HHMOA's rights to use software other than the manufacturer's. However, they considered that restricting this extension to software within BSCP601 is unnecessary. The respondent instead identified an alternative option in that 'Method 3' permits a MOA to use its own data retrieval system (which does not need protocol approval) whilst 'Method 4' allows the MOA to use the manufacturer's software. The respondent therefore suggested that the 'Method 4' wording should be identical to the current 'Method 3' wording so that the MOA is free to use its own data retrieval system under either 'Method 3' or 'Method 4'.

ELEXON confirmed that under 'Method 3' the MOA is free to use any software without a protocol approval if it chooses to consider this as its data retrieval system. However, we highlighted that if an MOA makes an error while collecting its data for a proving test then it is likely that error will be carried forward to the HHDC in the D0268 data flow. It will therefore be reasonable to expect the HHDC to arrive at the same but incorrect, readings

What is 'Method 3'?

Under 'Method 3' the MOA installs / reconfigures the MS and commissions the MS and records the HH reading while on site. When at the office, the MOA then uses its own data retrieval system to read the MS for the same HH Settlement Period as collected during the site visit. The MOA compares the HH Metered Data collected on site with the data retrieved at the office. The HHDC collects data for the HH Settlement Period of its own choosing and sends this to the MOA. The MOA uses its data retrieval system to read the Meter for the same HH Settlement Period provided by the HHDC.

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as the MOA. The Proposer of CP1439 acknowledged this concern but believed that there is no additional risk to what already exists.

Following the CP Consultation, ELEXON clarified all concerns with respondents. One of the respondents who had disagreed with the CP commented that it was unaware of the alternative option in 'Method 3' already permitting a MOA to use its own data retrieval system without protocol approval. They highlighted that they would distribute this information internally so that MOAs are aware of this option.

Comments on the proposed redlining

Ten of the 11 respondents to the CP Consultation agreed that the proposed redlined changes to BSCP502 and BSCP514 deliver the intention of CP1439. The one respondent who disagreed with the proposed redlining did not support the CP1439 proposed solution and so did not agree with the proposed redlined changes.

7 ELEXON's view

This section summarises ELEXON's view on the responses we received to the CP Consultation.

Does CP1439 introduce additional risk?

The proving test process was incorporated into the BSC at NETA Go-Live in 2001. It was intended to provide assurance of the validity of Settlement data obtained from Metering Systems. The process is manually intensive but, in general terms, is sufficient for one Metering System at a time. The principles underlying proving tests remain unchanged by CP1439, in that the MOA must compare the data provided by the HHDC with that which it has obtained from the Metering Equipment. Whether the MOA chooses to use the Meter manufacturer's software, a protocol-approved data collection system or, in the case of 'Method 3', any other non-approved system, there remains the possibility of error by the MOA. Allowing the use of a protocol-approved data collection system to collect data for a proving test does not therefore necessarily add risk to the process. However it does enable an alternative solution for the bulk CoMC required for P272. As with any other proving test method, the MOA must guard against human error.

ELEXON considers that, on balance, the risks identified by respondents exist now regardless of which system an MOA uses for a proving test. It is clear that the benefits offered by CP1439 are real and particularly relevant for the bulk P272 CoMC. ELEXON therefore recommends that the SVG approves CP1439.

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8 Final Committee Views and Decision

SVG's final views

The SVG made its decision on CP1439 at its meeting on 4 August 2015 (SVG174/04).

An SVG Member commented that the proposed changes are a good idea and that the BSCP601 software has been proven to be the same as the manufacturers'.

ELEXON highlighted the deficiencies of software which can only operate on a single Meter at a time and commented that proving is a manual process that may well hinder P272 migration. ELEXON noted the potential risks raised of the MOA and HHDC using the same software for a proving tests but that, to an extent, that risk exists now under the proving test Method 3.

Members of the SVG commented that 'Method 3' in BSCP502 and BSCP514 needs tidying up to provide further clarification. ELEXON advised that it is going to look at 'Method 3' in further detail and may raise a CP to amend this.

Final decision

The SVG has:

- **APPROVED** CP1439 for implementation on 5 November 2015 as part of the November 2015 BSC Systems Release.

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Appendix 1: Glossary & References

Acronyms

Acronyms used in this document are listed in the table below.

Acronyms	
Acronym	Definition
BSC	Balancing and Settlement Code *(Industry Code)*
BSCP	Balancing and Settlement Code Procedure *(Code Subsidiary Document)*
CoMC	Change of Measurement Class
CP	Change Proposal
CPC	Change Proposal Circular
DC	Data Collector *(Party Agent)*
HH	Half Hourly
MOA	Meter Operator Agent *(Party Agent)*
MTD	Meter Technical Details
NHH	Non Half Hourly
SVG	Supplier Volume Allocation Group *(Panel Committee)*

DTC data flows and data items

DTC data flows and data items referenced in this document are listed in the table below.

DTC Data Flows and Data Items	
Number	Name
D0268	Half Hourly Meter Technical Details

External links

A summary of all hyperlinks used in this document are listed in the table below.

All external documents and URL links listed are correct as of the date of this document.

External Links		
Page(s)	Description	URL
2	BSCPs page on the ELEXON website	https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/
2	P272 page on the ELEXON website	https://www.elexon.co.uk/mod-proposal/p272-mandatory-half-hourly-settlement-for-profile-classes-5-8/
3	CP1439 page on the ELEXON website	https://www.elexon.co.uk/change-proposal/cp1439/
5	P300 page on the ELEXON website	https://www.elexon.co.uk/mod-proposal/p300/

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External Links		
Page(s)	Description	URL
5	P322 page on the ELEXON website	https://www.elexon.co.uk/mod-proposal/p322/
5	SVG171 page on the ELEXON website	https://www.elexon.co.uk/meeting/svg-171/
9	SVG174 page on the ELEXON website	https://www.elexon.co.uk/meeting/svg-174/

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