# CP1442 'Clarifying the application process for Metering Dispensations'

This CP Consultation was issued on 8 June 2015 as part of CPC00757, with responses invited by 3 July 2015.

## Consultation Respondents

| Respondent | No. of Parties/Non-Parties Represented | Role(s) Represented |
|---|---|---|
| A Member of MDRG | 0/1 | A Member of MDRG |
| Western Power Distribution | 4/0 | Distributor |
| ScottishPower | 2/1 | Supplier; Distributor; Supplier Agent |
| British Gas | 1/0 | Supplier |
| SSE Energy Supply Limited | 1/0 | Supplier |
| E.ON Energy Solutions | 1/0 | Supplier |
| TMA Data Management Ltd | 0/1 | Supplier Agent |



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## Summary of Consultation Responses

| Respondent | Agree? | Impacted? | Costs? | Impl. Date? |
|---|---|---|---|---|
| A Member of MDRG | ✓ | ✓ | ✗ | ✓ |
| Western Power Distribution | ✓ | ✓ | ✗ | ✓ |
| ScottishPower | ✓ | ✓ | ✗ | ✓ |
| British Gas | ✓ | ✗ | ✗ | ✓ |
| SSE Energy Supply Limited | ✓ | ✗ | ✗ | ✓ |
| E.ON Energy Solutions | ✓ | ✗ | ✗ | ✓ |
| TMA Data Management Ltd | ✓ | ✗ | ✗ | ✓ |



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## Question 1: Do you agree with the CP1442 proposed solution?

### Summary

| Yes | No | Neutral/No Comment | Other |
|---|---|---|---|
| 7 | 0 | 0 | 0 |

### Responses

| Respondent | Response | Rationale |
|---|---|---|
| A Member of MDRG | Yes | The BSCP has not been reviewed for a while and will benefit from these changes |
| Western Power Distribution | Yes | N.A |
| ScottishPower | Yes | CP1442 looks to deliver a solution which requires the applicant to provide as much information at the start of the process to ensure an informed determination in relation to metering dispensations. |
| British Gas | Yes | N.A |
| SSE Energy Supply Limited | Yes | We very much support this solution, specifically the requirement for the applicant to provide a justification as to why all or part of the form should be treated as confidential. If this proposal is accepted we will watch with interest as to whether the challenge to provide a justification for confidentiality results in fewer confidential applications being raised. It has, for example, been highlighted that a Metering Dispensation provides the Boundary Point Supplier with visibility of a Third Party Supplier registering a 'logical' connection on a Private Network. Where a Metering Dispensation is kept as confidential it cannot be used to as a notification in this scenario. Whilst commercial incentives for the TPS to inform the Boundary Point Supplier may exist (Private Network pays volume for embedded customer) there is not an explicit requirement for them to do so. |
| E.ON Energy Solutions | Yes | N.A |
| TMA Data Management Ltd | Yes | N.A |



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## Question 2: Do you agree that the amendments made to the proposed solution in response to the Committees' comments better deliver the intent of CP1442?

### Summary

| Yes | No | Neutral/No Comment | Other |
|---|---|---|---|
| 7 | 0 | 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 |
|---|---|---|
| A Member of MDRG | Yes | The proposed changes improve the information and process behind the BSCP |
| Western Power Distribution | Yes | N.A |
| ScottishPower | Yes | We believe that the amendments made do better deliver the intent of CP1442.<br><br>We feel that it is more than reasonable to request that the applicant provides rationale for requesting dispensation, and for confidentiality.<br><br>The enhancements to this process (including for clarity the inclusion of views on risks to settlements) will be beneficial in expediting the resolution of the requests for dispensation. |
| British Gas | Yes | N.A |
| SSE Energy Supply Limited | Yes | N.A |
| E.ON Energy Solutions | Yes | N.A |
| TMA Data Management Ltd | Yes | N.A |



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## Question 3: Do you agree that the draft redlining delivers the CP1442 proposed solution?

### Summary

| Yes | No | Neutral/No Comment | Other |
|---|---|---|---|
| 5 | 2 | 0 | 0 |

### Responses

| Respondent | Response | Rationale |
|---|---|---|
| A Member of MDRG | No | This CP was not reviewed by the Metering Dispensation Review Group (MDRG) prior to submission which would perhaps have been appropriate. There are some redline comments in the table below |
| Western Power Distribution | No | There is no specific section for the applicant to "provide their views on the risk to Settlement and he risk to other BSC Parties as a result of their application" as specified in CP1442 Consultation. |
| ScottishPower | Yes | We believe that the draft redlining reflects the proposed solution. |
| British Gas | Yes | N.A |
| SSE Energy Supply Limited | Yes | N.A |
| E.ON Energy Solutions | Yes | N.A |
| TMA Data Management Ltd | Yes | N.A |



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## Question 4: Will CP1442 impact your organisation?

### Summary

| Yes | No | Neutral/No Comment | Other |
|---|---|---|---|
| 3 | 4 | 0 | 0 |

### Responses

| Respondent | Response | Rationale |
|---|---|---|
| A Member of MDRG | Yes | The changes will make the review by MDRG easier. |
| Western Power Distribution | Yes | Although this will affect our organisation, impact will be minimal and no system changes will be required. |
| ScottishPower | Yes | We do not believe that there will be any significant impact.<br><br>There is no drastic change to the process as it currently stands and the information that is being requested is such that it should be available at the earliest point in time.<br><br>We do not anticipate the provision of the additional information being an issue, as it is this information that will have formed the basis of the relevant Organisation's internal case to progress the application for dispensation. If anything we believe that the impact would be a positive one in ensuring that any applications are evaluated promptly due to increased information being available. |
| British Gas | No | N.A |
| SSE Energy Supply Limited | No | N.A |
| E.ON Energy Solutions | No | N.A |
| TMA Data Management Ltd | No | N.A |



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## Question 5: Will your organisation incur any costs in implementing CP1442?

### Summary

| Yes | No | Neutral/No Comment | Other |
|---|---|---|---|
| 0 | 7 | 0 | 0 |

### Responses

| Respondent | Response | Rationale |
|---|---|---|
| A Member of MDRG | No | N.A |
| Western Power Distribution | No | No system changes will be required |
| ScottishPower | No | N.A |
| British Gas | No | N.A |
| SSE Energy Supply Limited | No | N.A |
| E.ON Energy Solutions | No | N.A |
| TMA Data Management Ltd | No | N.A |



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## Question 6: Do you agree with the proposed implementation approach for CP1442?

### Summary

| Yes | No | Neutral/No Comment | Other |
|---|---|---|---|
| 7 | 0 | 0 | 0 |

### Responses

| Respondent | Response | Rationale |
|---|---|---|
| A Member of MDRG | Yes | N.A |
| Western Power Distribution | Yes | The implementation seems reasonable |
| ScottishPower | Yes | We believe that this solution provides a more transparent process for metering dispensation and should be introduced at the earliest opportunity. |
| British Gas | Yes | N.A |
| SSE Energy Supply Limited | Yes | N.A |
| E.ON Energy Solutions | Yes | N.A |
| TMA Data Management Ltd | Yes | N.A |



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## Question 7: Do you have any further comments on CP1442?

### Summary

| Yes | No |
|---|---|
| 1 | 6 |

### Responses

| Respondent | Response | Comments |
|---|---|---|
| A Member of MDRG | Yes | This CP was not reviewed by the Metering Dispensation Review Group (MDRG) prior to submission which would perhaps have been appropriate and allowed some further refinement of the text prior to submission. There is mention of a guidance note, so the opportunity should be used to allow a review of the draft by the MDRG. In particular the ISG & SVG have identified the subjective nature of objectively determining a risk rating which I would concur is difficult. The development of a guidance document may also provide an opportunity to refine the MRDG review process and provision of information in a more structured approach to ISG & SVG. |
| Western Power Distribution | No | N.A |
| ScottishPower | No | N.A |
| British Gas | No | N.A |
| SSE Energy Supply Limited | No | N.A |
| E.ON Energy Solutions | No | N.A |
| TMA Data Management Ltd | No | N.A |



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## CP Redlined Text

| BSCP32 | |
|---|---|
| Location | Comment |
| 1.5, 2nd para | Suggest adding a second sentence "Where the design is intended to be non-complaint and therefore require a Dispensation, then the approval must be sought prior to final design approval and procurement." The ISG & SVG comments reinforce the view that Dispensations should be an exceptional case. As a member of MDRG I have seen a number of applications where the original design was non-compliant, while it was only identified by the applicant at the commissioning stage, wherever possible this should be avoided. |
| 1.5 2nd para | Last sentence, "…unless specifically agreed by the Panel". The Panel can make any such decision at the time of making the determination. Note corresponding amendment for form in 4.1 |
| 1.5 3rd para | Suggest adding "…in any event in sufficient time for consideration by the MDRG and the BSC Panel, prior to…" |
| 1.6 | And the register shall be published on the BSC website https://www.elexon.co.uk/reference/technical-operations/metering/metering-dispensations/ |
| 1.8 | Maintain a list of all Dispensation on the BSC website |
| 3.1.2 | It may be clearer to introduce some explicit steps for the BSCCO to validate completeness and return to applicate with reasons, or to move on to next stage as valid application. This would then give clear timescales for the review stage. |
| 3.1.6 | Should the appropriate parties include a reference to MDRG? |
| After 3.1.10 | Add new row – within 10WD update BSC Dispensation register on BSC website |
| 4.1 part C | In the questions about materiality we need to include a question about 'risk'. This may be a separate question or added into an existing question. What seeking to identify is the risk associated with the solution. We have seen examples in the past where technically the solution worked, but the operational complexities of the proposal led to an increased the risk of subsequent failure which would lead to settlement error. |



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