

CP Progression Paper

CP1444 'Extend the timescale of CoP10 Proving Tests until the implementation of P272'

ELEXON



Committee

Supplier Volume Allocation
Group

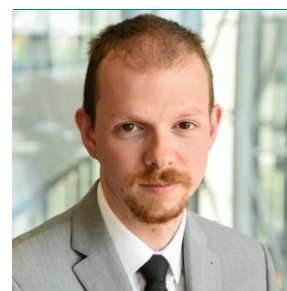


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About This Document

This document provides information on new Change Proposal (CP) CP1444 and outlines our proposed progression timetable for this change, including when it will be issued for CP Consultation in the next suitable Change Proposal Circular (CPC) batch.

We are presenting this paper to capture any comments or questions from Supplier Volume Allocation Group (SVG) Members on this CP before we issue it for consultation.

There are four parts to this document:

- This is the main document. It provides a summary of the solution, impacts, anticipated costs, and proposed implementation approach, as well as our proposed progression approach for this CP.
- Attachment A contains the CP1444 proposal form.
- Attachments B and C contain the proposed redlined changes to deliver the CP1444 solution.

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1 Why Change?



What is a proving test?

A proving test is undertaken by a Half Hourly Data Collector (HHDC) and a Half Hourly Meter Operator Agent (HHMOA) whenever a Half Hourly (HH) Metering System needs to be installed or reconfigured. One such instance is when a Metering System changes from a Non Half Hourly (NHH) Measurement Class to a HH Measurement Class.

A proving test generally involves the HHMOA requesting the HHDC to obtain a HH Meter reading for a given Settlement Period from the Metering System. The HHMOA will then compare this reading to the reading it obtained when it installed or reconfigured the Metering System, to determine whether it has passed or failed the test. This is usually a manual process for both Supplier Agents.

These tests are carried out to give assurance to the Supplier and the DC that information being received from the Metering System is correct. This assurance is necessary as the data is used both to bill the relevant customer and in Settlement.

Why were CoP10 Metering Systems exempt from proving tests?

Code of Practice (CoP) 10 'Metering of Energy via Low Voltage Circuits for Settlement Purposes' was introduced in February 2009 by [CP1261 'Introducing Metering Code of Practice 10 to facilitate smart metering in the HH market'](#). By introducing a lower specification CoP, this CP sought to make it more viable for Suppliers to move from NHH to HH Settlement without incurring significant costs. As part of this, CP1261 removed the need for proving tests for such whole current (WC) Metering Systems, which would not have had to undergo a proving test had they remained NHH.

CoP10 was originally intended to cover WC Meters for use in the HH elective (below 100kW) market. CP1261 envisaged that proving tests would still be required for secondary current transformer (CT) metering under CoP5 'The Metering of Energy Transfers with Max Demand of up to (and including) 1MW for Settlement Purposes'. [CP1273 'Changes to the scope of CoP10 to cover current transformer operated Meters'](#) subsequently extended CoP10 to include CT metering in June 2009. However, the exemption from proving tests for CoP10 Metering Systems was not changed as part of CP1273.

Why was this exemption removed?

The exemption from proving tests for CoP10 Metering Systems was removed in June 2015 by [CP1411 'Remove exemption from Proving Tests for Code of Practice 10 Metering Systems'](#). This CP had been progressed as a result of [P272 'Mandatory Half Hourly Settlement for Profile Classes 5-8'](#), as the CP1411 Proposed felt that the original case for removing barriers to elective HH had changed. They note that a significant number of the CoP10 Meters installed for the mandatory Automatic Meter Reading (AMR) Meter rollout will need to be settled HH under P272, and that these will therefore need to be migrated to HH Settlement by P272's Implementation Date of 1 April 2017. As a result, the CP1411 Proposed felt that proving tests should be applied for all HH Metering Systems, irrespective of whether or not they were mandated to be settled HH.

[CP1429 'Proving Test timescales'](#) was also implemented in June 2015 and put in place timescales for proving tests for a CoP10 Metering System. These timescales allow 15

What is a Measurement Class?

The Measurement Class of a Metering System reflects how it is settled, e.g. whether it is settled HH or NHH or whether it is metered or unmetered.

There are currently five Measurement classes:

- A: NHH Metered
- B: NHH Unmetered
- C: HH Metered that are 100kW Metering Systems
- D: HH Unmetered
- E: HH Metered that are not 100kW Metering Systems

From 5 November 2015, existing Measurement Class E will be split into three:

- E: HH CT Metering Systems that have site specific DUoS billing and are not 100kW Metering Systems
- F: domestic HH CT and WC Metering Systems that have aggregated DUoS billing and are not 100kW Metering Systems
- G: non-domestic HH WC metered Metering Systems that have aggregated DUoS billing and are not 100kW Metering Systems

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Working Days (WD) in which to complete the proving test, with a subsequent 15WD period given if a re-test is required.

How will this impact the migration to HH Settlement under P272?

P272 requires that all Metering Systems currently registered in Profile Classes (PCs) 5-8 which have an AMR Meter installed are settled HH no later than 1 April 2017. There are currently around 168,000 Metering Systems in PCs 5-8, and these will all need to be migrated to HH Settlement before P272's Implementation Date.

The implementation of [P300 'Introduction of new Measurement Classes to support Half Hourly DCUSA Tariff Changes \(DCP179\)'](#) on 5 November 2015 will introduce two new Measurement Classes for HH settled Metering Systems that are below the 100kW threshold. It is likely that the full-scale migration of Metering Systems impacted by P272 will not begin before this date, as Suppliers will want to migrate their Metering Systems to the correct Measurement Class. The implementation of Approved Modification [P322 'Revised Implementation Arrangements for Mandatory Half Hourly Settlement for Profile Classes 5-8'](#) on 3 August 2015 will also make 5 November 2015 the mandatory start date for the migration. This will give a window of around 17 months in which to complete the full migration before 1 April 2017.

What is the issue?

The number of Metering Systems due to be migrated is estimated to be in excess of 100,000, of which a large majority will be CoP10 Metering Systems. As part of this migration, the Metering Systems will need to move from a NHH Measurement Class to a HH Measurement Class, and therefore will need to undergo a proving test.

The Proposer believes that the current Change of Measurement Class (CoMC) process is not designed to handle such a large volume in such a short space of time. They are concerned that the timescales for proving tests for CoP10 Metering Systems are too short. They note that the normal volume of CoMCs in a given year is of the order of hundreds per HHMOA, while the volume during the P272 migration will be several times larger. This will require a corresponding increase in resource needed by HHMOAs. They also highlight [Ofgem's letter to the BSC Panel in April 2015](#) where Ofgem notes the CoMC process and the associated volume of CoMCs required under P272 could pose a potential risk to Settlement.

The Proposer considers that the reason for carrying out a proving test is to give Suppliers and HHDCs confidence that the data being retrieved from the Meter is correct both for billing and for Settlement purposes. However, they feel that the additional assurance a test provides for CoP10 Metering Systems transferring to HH Settlement is relatively minor. This is because the Meter must be providing regular remote NHH monthly readings prior to HH conversion, and the probability of an error for WC Meters is considered low. The Proposer is concerned that, during periods when a high volume of Metering Systems are being migrated, the following may happen:

- proving tests may be rushed by HHMOAs in order to meet timescales; or
- the timescales approved under CP1429 may be missed, resulting in the HHMOA being deemed non-compliant.

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How else is this risk being mitigated?

The Proposer has noted other changes that may mitigate this issue, but does not consider them to be enough to fully resolve the risks:

- P322 has introduced a longer timescale and a more structured approach for the P272 migration. However, the Proposer considers that, because contract renewals are seasonal, there will still be peak months of migration volumes which HHMOAs will find difficult to manage and resource.
- [CP1439 'Proving Test Permissible Software'](#) proposes to allow HHMOAs to use approved alternative software to Meter manufacturers' software when retrieving Meter configuration details for proving tests. If approved, this would allow proving tests for a batch of Meters to be carried out in parallel. However, the Proposer considers that, while some alternative software can do this, not all the approved alternative software used by Supplier Agents has this functionality.
- [CP1440 'Exempting Metering Systems in Measurement Class F from proving tests'](#) has exempted Metering Systems migrating to new Measurement Class F from proving tests, and will be implemented alongside P300. This will reduce the number of CoP10 Metering Systems requiring proving tests. However, the Proposer believes that these will constitute only around 5% of the Metering Systems affected by P272 and thus will have little impact on the overall volume of proving tests required.

Proposed solution

[CP1444 'Extend the timescale of CoP10 Proving Tests until the implementation of P272'](#)

was raised by Haven Power. It proposes to extend the approved proving test timescales for CoP10 Metering Systems from:

- 15WD to 30WD to complete the proving test; and
- 15WD to 30WD to complete a re-test should one be required.

The extended timescale will apply only to a proving test for a CoP10 Metering System that is started during the period:

- on or after the P300 Implementation Date (and P322 mandatory migration start date) of 5 November 2015; and
- up to but not including the P272 Implementation Date of 1 April 2017.

Proving tests started outside this window will remain subject to the timescales approved under CP1429.

The proving test timescales for Metering Systems that are assigned to any other CoP will be unaffected by CP1444.

Proposer's rationale

The Proposer believes that increasing the timescale for P272 proving tests for CoP10 Metering Systems will allow HHMOAs to smooth out the peaks and troughs in migration volumes. This will enable them to more effectively manage their part of the process. They can also put in place sufficient resource through retaining a dedicated group of staff for the period of the migration, rather than needing a temporary workforce to cover the peak periods. The Proposer also considers that the proposed increase in timescales will help reduce the likelihood of data quality issues. They consider that these potentially could be a risk to Settlement if this volume of proving tests had to be carried out to the timescales approved under CP1429.

The Proposer believes that the extended timescales provide a balance between mitigating the following:

- risk to Settlement arising from extending proving test timescales, which could mean it would take longer to identify a Metering System that has failed a test;
- risk of errors occurring when attempting to comply with the current 15WD timescale during periods of high volumes of proving tests; and
- risk of the HHMOA being non-compliant with the timescales for completing proving tests.

Proposed redlining

Attachments B and C contain the proposed changes to 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'.

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3 Impacts and Costs

Central impacts and costs

Central impacts

CP1444 will require changes to BSCP502 and BSCP514. No system changes are required, and there will be no impact on BSC Agents.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none">• BSCP502• BSCP514	<i>None</i>

Central costs

The central implementation costs for CP1444 will be approximately £240 (one ELEXON man day) to implement the relevant document changes.

BSC Party & Party Agent impacts and costs

There are no costs or impacts expected on BSC Parties or Party Agents due to the implementation of CP1444.

4 Implementation Approach

Recommended Implementation Date

The Proposer is requesting that CP1444 is implemented on **5 November 2015** as part of the November 2015 BSC Systems Release.

The Proposer is requesting this date as it aligns with P300's introduction of the two new Measurement Classes. They expect that the number of Metering Systems migrating to HH Settlement will notably increase after this time. Extending CoP10 proving test timescales from this date will allow HHMOAs to better handle proving test volumes during the implementation of P272. We do not see an issue with implementing CP1444 on this date, should it be approved, and so agree with this proposed implementation approach.

Progression timetable

The table below outlines the proposed progression timetable for CP1444:

Progression Timetable	
Event	Date
CP Progression Paper presented to SVG for information	04 Aug 15
CP Consultation	10 Aug 15 – 04 Sep 15
CP Assessment Report presented to SVG for decision	29 Sep 15
Proposed Implementation Date	05 Nov 15 (Nov 15 Release)

CP Consultation questions

We intend to ask the following standard CP Consultation questions for CP1444, as well as the additional questions set out on Page 9:

Standard CP Consultation Questions
Do you agree with the CP1444 proposed solution?
Do you agree that the draft redlining delivers the CP1444 proposed solution?
Will CP1444 impact your organisation?
Will your organisation incur any costs in implementing CP1444?
Do you agree with the proposed implementation approach for CP1444?

The Proposer has highlighted the trade-off between mitigating the risk of a HHMOA failing to meet proving test timescales and the risk to Settlement arising from taking longer to identify Metering Systems failing a proving test. They consider their proposed 30WD timescales provide the most suitable balance between the two.

We are concerned that by extending the timescales, as proposed by this CP, there is a risk of proving tests being unduly delayed which could otherwise be completed in 15WD. This could result in a longer period over which Settlement error could build, and which would need correcting if the Metering System failed the proving test. We consider this risk to Settlement to outweigh the consequences of a HHMOA failing to meet the proving test timescales. We therefore consider that the timescales should not be extended but that HHMOAs should continue to endeavour to meet the timescales approved under CP1429. We believe views on this balance of risk should be sought from CP Consultation respondents.

As part of this, we believe it would also be beneficial to ask HHMOAs whether the extended timescales proposed by CP1444 will be long enough for them to be able to resolve all failed proving tests, or whether there will still remain the risk that they could fail to meet these timescales. In light of the risks discussed above, we would not consider it appropriate to extend the timescales if HHMOAs would still be unable to meet them.

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Additional CP Consultation Questions

Do you consider that the potential risk to Settlement from extending the timescales for CoP10 proving tests would outweigh the consequences of a HHMOA failing to meet timescales?

Do you consider that the proposed 30WD timescales is long enough to resolve each failed proving test during the P272 migration period?

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6 Recommendations

We invite you to:

- **NOTE** that CP1444 has been raised;
- **NOTE** the proposed progression timetable for CP1444; and
- **PROVIDE** any comments or additional questions for inclusion in the CP Consultation.

Appendix 1: Glossary & References

Acronyms

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

Acronyms	
Acronym	Definition
AMR	Automatic Meter Reading
BSCP	Balancing and Settlement Code Procedure (<i>Code Subsidiary Document</i>)
CoMC	Change of Measurement Class
CoP	Code of Practice (<i>Code Subsidiary Document</i>)
CP	Change Proposal
CPC	Change Proposal Circular
CT	current transformer
HH	Half Hourly
HHDC	Half Hourly Data Collector (<i>Party Agent</i>)
HHMOA	Half Hourly Meter Operator Agent (<i>Party Agent</i>)
NHH	Non Half Hourly
PC	Profile Class
SVG	Supplier Volume Allocation Group (<i>Panel Committee</i>)
WC	whole current
WD	Working Day(s)

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	CP1261 page on the ELEXON website	https://www.elexon.co.uk/change-proposal/cp1261-introducing-metering-code-of-practice-10-to-facilitate-smart-metering-in-the-half-hourly-hh-market/
2	CP1273 page on the ELEXON website	https://www.elexon.co.uk/change-proposal/cp1273-changes-to-the-scope-of-cop10-to-cover-current-transformer-operated-meters/
2	CP1411 page on the ELEXON website	https://www.elexon.co.uk/change-proposal/cp1411/
2	P272 page on the ELEXON website	https://www.elexon.co.uk/mod-proposal/p272-mandatory-half-hourly-settlement-for-profile-classes-5-8/

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External Links		
Page(s)	Description	URL
2	CP1429 page on the ELEXON website	https://www.elexon.co.uk/change-proposal/cp1429/
3	P300 page on the ELEXON website	https://www.elexon.co.uk/mod-proposal/p300/
3	Ofgem's Response to the BSC Panel's Request to Extend the P272 Implementation Date on the Ofgem website	https://www.ofgem.gov.uk/publications-and-updates/ofgem-response-request-extension-implementation-date-balancing-and-settlement-code-modification-p272
3	P322 page on the ELEXON website	https://www.elexon.co.uk/mod-proposal/p322/
4	CP1439 page on the ELEXON website	https://www.elexon.co.uk/change-proposal/cp1439/
4	CP1440 page on the ELEXON website	https://www.elexon.co.uk/change-proposal/cp1440/
5	CP1444 page on the ELEXON website	https://www.elexon.co.uk/change-proposal/cp1444/