

Change Proposal – BSCP40/02

CP No: 1444

*Version No: 1.0
(mandatory by BSCCo)*

Title

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

Description of Problem/Issue

P272 ‘Mandatory Half Hourly Settlement for Profile Classes 5-8’ will require any Profile Class (PC) 5-8 Metering System to be settled Half-Hourly (HH) where capable metering has been installed. This Modification is due for implementation on 1 April 2017. In support of P272, three other industry changes have been progressed that are very closely linked:

- CP1411 ‘Remove exemption from Proving Tests for Code of Practice 10 Metering Systems’ removed the exemption from Proving Tests for Code of Practice (CoP) 10 Metering Systems in BSCP514 8.3.1 and BSCP502 4.6.1. Proving Tests are now mandatory for all HH Metering Systems. This change took effect from 25 June 2015.
- CP1429 ‘Proving Test timescales’ sets out the timescales for CoP10 meter Proving Tests and was implemented on 25 June 2015, alongside CP1411.
- P300 ‘Introduction of new Measurement Classes to support Half Hourly DCUSA Tariff Changes (DCP179)’ will introduce two new Measurement Classes for Sub 100kW Metering Systems, and will be implemented on 5 November 2015.

All CoP10 Meters in PC 5-8 that were migrated to HH Settlement before 25 June 2015 were exempt from Proving Tests; however they may require a subsequent Change of Measurement Class (CoMC) following the implementation of P300, and may therefore require a Proving Test at that stage. Those CoP10 Meters in PC 5-8 that were not migrated to HH Settlement before 25 June 2015 will have to undergo a Proving Test, as per CP1411.

The industry has around 168,000 PC 5-8 meters to transition. It is our assumption that the industry will not undertake the transition until after the implementation of P300, as this removes any duplication of work in ensuring Meters are classified in the correct Measurement Class for the implementation of P272. This transition represents an exponential increase in volume of Meters undergoing Change of Measurement Class compared to normal industry CoMC volumes; this will place a strain on both Suppliers’ and Supplier Agents’ resources and could result in a significant risk of non-compliance.

With the approval of Modification P322 ‘Revised Implementation Arrangements for Mandatory Half Hourly Settlement for Profile Classes 5-8’, there will be a more structured transition of Metering Systems. The P272 Implementation Date is moved to 1 April 2017, which allows participants more time to migrate their Meters.

However we still consider the 17-month window this creates between the implementation of P300 and P272 to be too small for the expected number of Proving Tests that CP1411 requires. We consider that the RFI data provided as part of P322’s assessment demonstrates monthly fluctuations in contract renewals, and making the assumption the transitions will

likely occur at contract renewal, it will be difficult for Meter Operator Agents to manage the CoMC and Proving Tests during peak months.

It is likely that the Proving Test itself would be rushed due to time constraints during peak times, which could introduce errors. Secondly, the CoMC process quality could be compromised by the burden placed on the Agent having to jointly contribute to the CoMC work as well as complete the Test in the existing timescales.

Proposed Solution

It is proposed that Proving Test timescales for CoP10 meters defined in CP1429 be extended to allow the Proving Test to be completed in 30 Working Days (WD), with a subsequent 30WD should a re-test be required. These timescales would be valid for the period starting on 5 November 2015 and ending upon the implementation of P272.

To remove uncertainty, this Change Proposal would relate to any CoP10 Meters that commence a CoMC on or after 5 November 2015 up to and including the last calendar day before the P272 Implementation Date. Any CoMC for a CoP10 Meter that commences on or before 4 November 2015 or on or after the P272 Implementation Date would remain subject to the timescales approved under CP1429.

This Change Proposal intends that the end-date for the changes made to the timescales stay aligned with P272, should there be any further change to the P272 Implementation Date.

Justification for Change

The reason for carrying out Proving Tests is to give Suppliers and HH Data Collectors the confidence that the data being retrieved from the Meter is correct, not only for the quality of service provided to the customer in the accuracy of their supply bill, but it would also give the appropriate assurances for the integrity and accuracy of data entering Settlements.

The triggers for Proving Testing include:

- Changes to key Meter Technical Details
- Meter reconfigured / replaced
- Following a change of Measurement Class from NHH to HH.

The additional assurance the Proving Test provides in the case of CoP10 Meters transferring to HH Settlement is relatively minor as the Meter must be providing regular remote NHH readings monthly prior to HH conversion, with the majority of instances being whole current Meters where it is recognised that the probability of errors in retrieved readings is low.

The volume of CoP10 Meters in PC 5-8 that is due to be migrated to HH Settlement to meet the requirements of P272 is in excess of 100,000 across the industry. A CoMC, which would be required as part of this migration, includes the requirement that the Half Hourly Meter Operator Agent (HHMOA) carries out a Proving Test. It is well recognised within the industry that the CoMC process is a challenging process with the normal annual volumes of several hundred CoMCs per HHMOA. The volumes involved with P272 will be several magnitudes larger. It has been noted in the Ofgem letter to the BSC Panel, dated 20 April

2015, that there is a potential risk to Settlement because of the CoMC process and the volume associated with the migration.

The same letter noted that those CoP10 Meters which are Current Transformer (CT) could be migrated prior to 5 November 2015. However the evidence provided to the Authority indicates that the majority of Meters including CT Meters will be migrated after 5 November 2015.

The Meters migrating to new Measurement Classes F and G are not able to commence migration until 5 November 2015 when P300 becomes effective.

Two further CPs have been proposed which will have limited effect in addressing this issue across the Industry:

- CP1439 'Proving Test Permissible Software' proposes to use approved alternative software to Meter manufacturers' software to retrieve the Meter configuration details that the HHMOA is required to do as part of Proving Tests. This would allow proving tests to be done for a batch of Meters instead of individually. However, we consider that, while some alternative software can do this, not all the approved alternative software used by Supplier Agents has this functionality.
- Approved CP1440 'Exempting Metering Systems in Measurement Class F from proving tests' will allow Meters migrating to Measurement Class F to be exempt from Proving Tests. However, while this will reduce the number of CoP10 Meters requiring Proving Tests, these Meters will constitute only a small proportion, believed to be less than 5% of those being migrated, and thus will make little impact on the overall volume requiring Proving Tests.

The issue that HHMOAs are facing is the resourcing to meet the requirements of Proving Tests prior to the implementation of P272.

As previously noted P322 could be of potential benefit in providing a longer timescale for the migration, however because contract renewals are seasonal there will still be peak months of migration volumes which HHMOAs will find difficult to manage and resource.

By increasing the timescale for the Proving Tests on CoP10 Meters prior to P272, HHMOAs will be able to more effectively manage their part of the process and to resource accordingly by allowing them to smooth out the peaks and troughs in migration volumes. This will allow Agents to retain a dedicated group of staff for the period of the migration as opposed to a temporary workforce to cover the peak periods, This increase in the Proving Test timescales will help reduce the likelihood of data quality issues which potentially could be a Risk to Settlement if this volume of Proving Tests had to be carried out to the timescales of CP1429

The proposed extension to 30WD for the CoP10 Meter Proving Test is a balance between mitigating errors occurring when attempting to comply with the 15WD timescale of CP1429 due to the volume of Tests and the potential Risk to Settlement because of a longer period before Proving is completed for the Meter.

After the implementation of P272, any CoP10 Meter requiring a Proving Test will be subject

to the original timescales approved under CP1429.
<p>To which section of the Code does the CP relate, and does the CP facilitate the current provisions of the Code?</p> <p>Section S ‘Supplier Volume Allocation’</p>
<p>Estimated Implementation Costs (mandatory by BSCCo)</p> <p>£240 (1 man day) to implement the relevant document changes.</p>
<p>Configurable Items Affected by Proposed Solution(s)</p> <p>BSCP502 ‘Half Hourly Data Collection for SVA Metering Systems Registered in SMRS’</p> <p>BSCP514 ‘SVA Meter Operations for Metering Systems Registered in SMRS’</p>
<p>Impact on Core Industry Documents or System Operator-Transmission Owner Code</p> <p>n/a</p>
<p>Related Changes and/or Projects (mandatory by BSCCo)</p> <p>This CP is directly related to approved Change Proposals CP1411 and CP1429 and has interaction with proposed Change Proposal CP1439 and approved Change Proposal CP1440. The dates put forward under this CP are being driven by Approved Modifications P272, P300 and P322.</p>
<p>Requested Implementation Date</p> <p>5 November 2015</p> <p>Reason: This date aligns with the implementation of P300, after which we expect that the number of transfers of Metering Systems will notably increase following the introduction of the two new Measurement Classes. This will allow HHMOAs to be able to better handle the volume of Proving Tests required before the implementation of P272.</p>
<p>Version History (mandatory by BSCCo)</p> <p>Version 1.0 was raised by Haven Power on 7 July 2015.</p>

Originator's Details:

BCA Name: David Crossman

Organisation: Haven Power

Email Address: david.crossman@havenpower.com

Telephone Number: 01473 707167

Date: 7 July 2015

Attachments: **N** (If Yes, No. of Pages attached:)
(delete as appropriate)