

CP Consultation Responses

CP1452 'Aligning BSCP502 with amendments to the Electricity Supply Licence'



This CP Consultation was issued on 7 December 2015 as part of CPC00761, with responses invited by 8 January 2016.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
IMServ	0/1	HHDC
TMA Data Management Ltd	0/1	HHDC, HHDA, NHHDC and NHHDA
SSE Energy Supply Limited	1/1	Supplier, HHMOA
Northern Powergrid	1/0	Distributor
SP Dataserve Ltd	0/1	Supplier Agent
E.ON Energy Solutions	1/0	Supplier

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
IMServ	✓	✓	✓	✓
TMA Data Management Ltd	✓	✓	✓	✓
SSE Energy Supply Limited	✓	✗	✗	✓
Northern Powergrid	✗	✓	✗	✗
SP Dataserve Ltd	✓	✓	✗	✓
E.ON Energy Solutions	✓	✗	✗	✓

Question 1: Do you agree with the CP1452 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
5	1	0	0

Responses

Respondent	Response	Rationale
IMServ	Yes	None provided.
TMA Data Management Ltd	Yes	We support the alignment of requirements for measurement class E sites with those of measurement class G and F.
SSE Energy Supply Limited	Yes	We agree that the solution adequately aligns the BSC requirements with the changes to the SLCs. We support retaining Meter inspections requirements for Measurement Class C to manage settlement risk. We agree that the requirements should be removed for Measurement Classes E, F and G so that BSC arrangements align with the intentions for amending SLC 12.14-16, including the long-term economic benefits of smart metering. Removal of these requirements should have a neutral impact upon the integrity of settlements.
Northern Powergrid	No	<p>We do not agree with the proposed solution at this stage and believe this CP may benefit from further analysis, including on the original purpose of BSCP502 'Half Hourly Data Collection for Systems Registered in SMRS'. If part of the purpose of BSCP502 was so that inspection obligations supported continued metering accuracy of larger metering systems and the consequential accuracy of settlements e.g. for 3-phase Half Hourly (HH) CT metering systems it is appropriate to retain inspection obligations for both Measurement Classes C & E.</p> <p>We do understand the rationale to remove inspection obligations for meters in measurements classes F & G.</p> <p>We note and understand the drivers to reduce inspections for mass market metering and we also note Ofgem's view on other industry developments being effective ways to 'achieve the desired policy objectives on meter inspections'. However, we would query whether those policy objectives are the same as those which originally created BSCP502 (at</p>

Respondent	Response	Rationale
		<p>the time of Code Effective Date). We note that the policy objectives used by Ofgem for its analysis on page 17 of its consultation 'Reforming Suppliers' meter inspection obligations' (published on 23rd July 2015) are:</p> <ul style="list-style-type: none"> • Health and safety; • Theft detection; and • Billing accuracy. <p>Whereas we assume the policy objectives that originally drove the creation of BSCP502 included:</p> <ul style="list-style-type: none"> • Metering system accuracy (for HH metering); and • Settlement accuracy. <p>Specifically, we would query whether an original policy objective of BSCP502 was to maintain the accuracy of more complicated metering systems (including all HH CT metering - irrespective of measurement class definitions). We note in the proposer's rationale that 'the current BSCP502 inspection requirements were originally intended for 100kW Metering Systems' ... Is it also true that the inspection requirements in BSCP502 at Code Effective Date were originally aimed at all HH metering systems i.e. CT metering of all types irrespective of voltage, kWh capacity or measurement class?</p> <p>We agree with the rationale to retain inspection obligations for measurement class C metering systems, but we are unsure of the rational to remove the obligation to inspect measurement class E metering systems, particularly as the metering systems for measurement class C and E could be identical and therefore present the same technical risks that might lead to inaccuracy.</p>
SP Dataserve Ltd	Yes	Yes-accept.
E.ON Energy Solutions	Yes	None provided.

Question 2: Do you agree that the draft redlining delivers the CP1452 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
5	1	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
IMServ	Yes	None provided.
TMA Data Management Ltd	Yes	We understand that the safety aspect of the visit is removed for measurement class C sites, however we would like to get clarification on what is the site visit agent feedback to be if visible safety issues are found.
SSE Energy Supply Limited	Yes	None provided.
Northern Powergrid	No	We query whether the intent has been sufficiently considered in relation to different types of metering systems and the original objectives of BSCP502 prior to the draft redlining being produced.
SP Dataserve Ltd	Yes	None provided.
E.ON Energy Solutions	Yes	None provided.

Question 3: Will CP1452 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
3	3	0	0

Responses

Respondent	Response	Rationale
IMServ	Yes	System changes.
TMA Data Management Ltd	Yes	Our systems and procedures would be impacted by CP1452.
SSE Energy Supply Limited	No	This proposal does not impact us inasmuch that this is broadly an exercise of aligning the BSC with Standard Licence Conditions; therefore the impacts are from the SLC changes and not related to CP1452.
Northern Powergrid	Yes	Yes, potentially, if reduced metering system inspection leads to reduced meter accuracy there may be an impact on the accuracy of settlements data and industry level consumption data in general.
SP Dataserve Ltd	No	No impact.
E.ON Energy Solutions	No	None provided.

Question 4: Will your organisation incur any costs in implementing CP1452?

Summary

Yes	No	Neutral/No Comment	Other
2	4	0	0

Responses

Respondent	Response	Rationale
IMServ	Yes	There will be a one off cost in developing our internal systems to conform to this proposal. It is unlikely that this cost would be significant as the development required will be fairly modest.
TMA Data Management Ltd	Yes	The cost associated to CP1452 is expected to be low to medium.
SSE Energy Supply Limited	No	None provided.
Northern Powergrid	No	None provided.
SP Dataserve Ltd	No	None provided.
E.ON Energy Solutions	No	None provided.

Question 5: Do you agree with the proposed implementation approach for CP1452?

Summary

Yes	No	Neutral/No Comment	Other
5	1	0	0

Responses

Respondent	Response	Rationale
IMServ	Yes	None provided.
TMA Data Management Ltd	Yes	Could you please confirm the actual implementation date for Supplier agents as April 2016?
SSE Energy Supply Limited	Yes	We support the implementation though we note the SLCs take precedence over BSC.
Northern Powergrid	No	No, not at this stage. We believe more analysis is necessary on whether inspection obligations should be maintained for all HH 3-phase CT metering systems - particularly for measurement class E.
SP Dataserve Ltd	Yes	None provided.
E.ON Energy Solutions	Yes	None provided.

Question 6: Do you have any further comments on CP1452?

Summary

Yes	No	Neutral/No Comment	Other
2	4	0	0

Responses

Respondent	Response	Rationale
IMServ	No	n/a
TMA Data Management Ltd	Yes	As mentioned in our response to question 2 we are unsure about what is expected if safety issues are found. We would like some clarification on the subject but would propose that they are reported as they currently are via the site visit feedback forms and reported to the Supplier, distributor, SFIC as necessary.
SSE Energy Supply Limited	No	n/a
Northern Powergrid	Yes	We welcome the SVG's intention to reconsider this issue when industry responses to the CP consultation are presented.
SP Dataserve Ltd	No	n/a
E.ON Energy Solutions	No	n/a

BSCP502

There were no comments on the proposed redlined changes to BSCP502.