

# CP Consultation Responses



## CP1458 v2.0 'Introduction of timescales for the P283 Commissioning process for SVA CT operated Metering Systems'

This CP Consultation was issued on 11 July 2016 as part of CPC00768, with responses invited by 5 August 2016.

### Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
British Gas	1/0	Supplier
E.ON Energy Solutions	1/1	Supplier, Supplier Agent
GTC	2/0	Distributor
IMServ	0/1	Supplier Agent
Northern Powergrid	1/0	Distributor
ScottishPower Energy Retail	1/1	Supplier, Supplier Agent
ScottishPower	2/4	Generator, Distributor, ECVNA, MVRNA
SSE Energy Supply Limited	1/1	Supplier, Supplier Agent
TMA Data Management Ltd	0/1	Supplier Agent
UK Power Networks Operations Ltd	1/0	Distributor
Western Power Distribution	1/0	Distributor

## Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
British Gas	✓	✗	✗	✓
E.ON Energy Solutions	✗	✓	✓	✗
GTC	✓	✓	✓	✗
IMServ	✓	✓	✓	✓
Northern Powergrid	✗	✓	✗	✓
ScottishPower Energy Retail	✗	✓	✓	✗
ScottishPower	✗	✓	✓	✗
SSE Energy Supply Limited	✓	✓	✗	✓
TMA Data Management Ltd	✓	✗	✗	✓
UK Power Networks Operations Ltd	✗	✓	✓	✗
Western Power Distribution	✓	✓	✓	✗

## Question 1: Do you agree with the CP1458 v2.0 proposed solution?

### Summary

Yes	No	Neutral/No Comment	Other
6	5	0	0

### Responses

Respondent	Response	Rationale
British Gas	Yes	-
E.ON Energy Solutions	No	<p>We are concerned by the timescales within v2.0; whilst we note confirmation that sites with no load to be out of scope for this process, we are mindful that alternative methods of commissioning have not been suggested. To our knowledge, (where the LDSO has installed Transformers in such a manner that we physically cannot inject load), there is no alternative to commissioning once the meter and supply are live and consuming. We are mindful that this can be well in excess of the timescales noted in the solution.</p> <p>Further, we strongly believe that the LDSO should make available as soon as they can any records pertaining to the Transformer ratios to the Supplier, who, on receipt can instruct HHMOA to install against those Transformers. The lack of this approach within the proposed solution carries risk.</p> <p>We are mindful that the LDSO does not always advise us, in a timely fashion, of the energisation of a supply and that we therefore lack clarity as to whether our timescale starts on the date we are notified by LDSO, or the actual effective date of the energisation.</p> <p>We raised, in our response to the previous consultations on this CP, questions and issues which we do not think have been suitably addressed. We would welcome an opportunity to discuss these prior to a decision on this CP being made.</p>
GTC	Yes	<p>We give our qualified support for this process. Moving the timescales to align with the physical energisation of the service cable reduces the risk to settlement compared to version one of this proposal and better aligns with the provisions of the BSC.</p> <p>We do have some concerns about the rigidity that timescales introduce. It is unclear what would happen where CT/VT testing cannot take place through reasons outside of the control of the LDSO</p>

Respondent	Response	Rationale
		(lack of load, access issues etc.).
IMServ	Yes	-
Northern Powergrid	No	<p>Although we agree with the principle of the proposed process change and understand the need to apply timescales to the commissioning process, we have concerns with some of the lower level details of the change.</p> <p>This new drafted version of the BSCP notes the trigger will be the live 'energisation' date. The definition of 'energisation' needs to be clear as it could be interpreted as the incoming supply being live (the LDSO responsibility) or the outgoing side being live (the MOA responsibility for standard HDCO/ISU installations). If it's the latter the LDSO may not be aware of the trigger point to start the clock in circumstances where commission wasn't done prior to energisation (see later comment).</p>
ScottishPower Energy Retail	No	<ol style="list-style-type: none"> <li>1. Balancing and Settlement Code (BSC) Section L2.3.2 states that the Registrant must make 'all reasonable endeavours' to commission before energisation. The proposed timescales indicate that commissioning should start after energisation. It is not practical or safe to carry out Stage 1 (LDSO) commissioning test after energisation.</li> <li>2. The proposed timescales indicate that it acceptable for a supply to remain un-metered for up to 16 days after energisation.</li> <li>3. The MOA escalation loop is infinite if the LDSO fails to respond.</li> <li>4. P283 was introduced to place Commissioning obligations on the equipment owner, shifting responsibility for Commissioning of Measurement Transformers from the Meter Operator Agent (MOA) to the Licensed Distribution System Operator (LDSO). The MOA escalation loop returns responsibility for policing this to the MOA.</li> </ol>
ScottishPower	No	<p>While we believe that all commissioning should be carried out before a site is energised we recognise that this is not always possible and we accept that the proposed 26 day timescale is achievable. However, we do not agree with the proposed solution as it envisages the solution being in place and implemented on 3rd November 2016 and at this</p>

Respondent	Response	Rationale
		<p>stage there appears to be no mechanism in place for parties to manage such a process. We understand that Elexon are proposing to raise an MRA change which will introduce a new data flow in respect of the commissioning process, this being the case we understand the earliest possible date that such a flow can be implemented will be the June 2017 release. Given the difference in the timescales, we believe that CP1458 should be actioned within the BSC at the same time as the introduction on the new commissioning data flow as this should in theory introduce a seamless process.</p>
SSE Energy Supply Limited	Yes	<p>We agree that CP1458 should deliver some incremental improvements to the commissioning process, which we support. Development of timescales is something which has been discussed at length. We nevertheless reserve judgement on whether the solution will necessarily deliver a robust and efficient process in all cases.</p> <p>We welcome footnote 18 reiterating the Registrants option to escalate to BSCCo where complete Commissioning Information has not been provided by the LDSO. Support from BSCCo in these situations could be useful; however it does not remove the Registrants non-compliance with the BSCCP, the financial risks, or customer impacts, where the Commissioning Information has not been received.</p> <p>Overall we are supportive of the proposal and, if approved, will see how the proposals work in the 'real world'. We would see merit in reviewing the effectiveness of the solution in the future, for example by looking at audits (and similar) and/or operational experiences of parties to see whether the process is sufficiently robust.</p>
TMA Data Management Ltd	Yes	-
UK Power Networks Operations Ltd	No	<p>Whilst we are supportive of the proposal to improve the Settlement process, we still have a number of concerns regarding the drafting in the BSCPs. The previous audit determined that the majority of LDSOs and MOPS were non-compliant with the existing requirements. CP1458 represents an extension of the original requirements and therefore places further stress on systems and processes that were already deemed as failing. We believe that without the ability to utilise data flows, we are unlikely to be able to meet the requirements specified by CP1458.</p>

<b>Respondent</b>	<b>Response</b>	<b>Rationale</b>
Western Power Distribution	Yes	WPD agrees with the principle of the proposed solution but has reservations about some of the detail (see response to other questions for further information).

## Question 2: Do you agree that the draft redlining delivers the CP1458 v2.0 proposed solution?

### Summary

Yes	No	Neutral/No Comment	Other
6	4	1	0

### Responses

A summary of the specific responses on the draft redlining can be found at the end of this document.

Respondent	Response	Rationale
British Gas	Yes	-
E.ON Energy Solutions	Yes	-
GTC	Yes	Yes
IMServ	Yes	-
Northern Powergrid	No	We believe that the process changes are required and that the drafting reflects this however we have concerns, based on the specific issues raised in this response.
ScottishPower Energy Retail	No	Do not agree with CP1458v2 proposed solution.
ScottishPower	No comment	-
SSE Energy Supply Limited	Yes	-
TMA Data Management Ltd	Yes	-
UK Power Networks Operations Ltd	No	The new red line procedures outlined state the requirement of the LDSO to provide complete commissioning information for a new connection. Complete commissioning information as outlined in Code of Practice 4 places a requirement for both calibration and test information. However, we feel that this requirement is too wide and that only key items of information referred to as Part 1 of the commissioning form are required (within time bounds) in order to prove commissioning. UKPN feel the LDSO should be able to provide calibration certification at a later date.
Western Power	No	a) Section 5.2.2.A.4 of BSCP514 effectively says that customer's consumption can be

Respondent	Response	Rationale
Distribution		<p>unmetered for up to 16WD following energisation - this cannot be correct. The metering system should be commissioned on the date agreed in 5.2.2.5 <u>ON THE PRESUMPTION</u> that commissioning of the measurement transformers is correct. The latter will be verified retrospectively by the LDSO i.e. up to 16WD following energisation.</p> <p>b) Sections 5.2.2.A.5 to 5.2.2.A.8 of BSCP514 relate to "omissions" that have prevented commissioning. It is not clear whether omissions include the non-provision of commissioning information by the LDSO (which is covered by Sections 5.2.2.A.10 to 5.2.2.A.11). This requires clarification.</p> <p>c) Where the HHMOA is responsible for commissioning measurement transformers the requirements should be exactly the same as where the LDSO does. In the "Information Required" box associated with Section 5.2.2.A.3 of BSCP514 it should state "This shall include all records in accordance with Code of Practice 4".</p> <p>d) Section 5.3.5 of BSCP514 originally covered the LDSO replacing the meter and has been amended to include replacement of the measurement transformers. The requirements are not relevant where the measurement transformers are being replaced e.g. due to equipment failure or end of life replacement. It is suggested that consideration is given to including a separate section (e.g. 5.3.5.A) to cover this aspect.</p> <p>e) Section 6.3.4.3 of BSCP514 has been amended to include replacement of measurement transformers. Is this relevant for NHH systems following Change Proposal P272?</p> <p>Equivalent comments apply to BSCP515.</p> <p>Please see specific comments in the "CP Redlined Text" section below.</p>

## Question 3: Will CP1458 v2.0 impact your organisation?

### Summary

Yes	No	Neutral/No Comment	Other
9	2	0	0

### Responses

Respondent	Response	Rationale
British Gas	No	-
E.ON Energy Solutions	Yes	<p>There will be a need for HHMOA to revise processes, and agree differing processes between Suppliers and DNOs.</p> <p>There will be an impact on engineering resource, increasing costs and reducing availability to attend site, if there are additional documents (DNO) that require sign off.</p> <p>We believe that there is an associated commercial risk with owning the sign off of the DNO documents against our own in case of misinterpretation of a document that HHMOA did not produce.</p> <p>There will be associated costs with increasing resource on these processes, as well as re-writing the processes and updating our systems.</p>
GTC	Yes	<p>Yes. This change proposal could have significant impacts on our organisation. Whilst this process is currently being undertaken we believe that the introduction of timescales will alter the administrative and operational processes associated with measurement transformer commissioning.</p> <p>It is likely that some internal systems updates may also be required in order for us to monitor and adhere to the timescales requested by this CP.</p>
IMServ	Yes	<p>Assuming this change is being introduced prior to the introduction of any associated DTN flow, the changes required include: Review and update to process, macros, work instructions, monitoring reports and training</p>
Northern Powergrid	Yes	<p>The change will require internal process amendments in order to ensure compliance.</p>
ScottishPower Energy Retail	Yes	<p>Additional monitoring, record keeping and follow up will be required.</p>

Respondent	Response	Rationale
ScottishPower	Yes	There will be a requirement for changes to internal processes to ensure compliance, and tweaks to Policy Documents, Internal systems and Control measures to ensure accuracy in monitoring of Guidelines and Processes to comply with this change. There will also be a requirement for additional training for operatives to ensure that they are aware of changes.
SSE Energy Supply Limited	Yes	Minor – not significant changes.
TMA Data Management Ltd	No	-
UK Power Networks Operations Ltd	Yes	Our organisation will be impacted by CP1458 in that further revision to systems and processes will be required, along with associated training for staff and contractors. From a customer service perspective, it must also be considered that it is not always practical or convenient for customers to accommodate subsequent LDSO visits required to obtain CT / VT commissioning information where there was previously no load at the time of installation.
Western Power Distribution	Yes	<p>Whilst WPD has had an obligation to commission the metering CTs &amp; VTs it owns or adopts since November 2014 there has not been any mandated timescale for completing this activity.</p> <p>Activities WPD will need to undertake between the approval and implementation date will include: making the necessary company policy document changes, amending company systems and processes, and briefing / training staff on the revised requirements.</p>

## Question 4: Will your organisation incur any costs in implementing CP1458 v2.0?

### Summary

Yes	No	Neutral/No Comment	Other
7	4	0	0

### Responses

Respondent	Response	Rationale
British Gas	No	-
E.ON Energy Solutions	Yes	We believe that these will be minimal, but there will be associated costs with amending processes, and documenting these amends. We need to complete further analysis to understand potential OPEX considerations.
GTC	Yes	We are unable to fully quantify the costs that we will incur in implementing this change proposal. It is anticipated that systems changes will need to be implemented to ensure the administrative processes run to the given timescales. These are likely to run into £000s.
IMServ	Yes	-
Northern Powergrid	No	Although a thorough impact assessment is required, initially we do not envisage substantial costs would be incurred if this change is approved.
ScottishPower Energy Retail	Yes	The answer to Question 3 above will require systems changes and will have an additional FTE requirement to administer.
ScottishPower	Yes	We are unable to quantify the cost at this point, although it is not felt to be significant
SSE Energy Supply Limited	No	-
TMA Data Management Ltd	No	-
UK Power Networks Operations Ltd	Yes	Analysis has not yet been undertaken with respect to the precise costs implications of implementing CP1458. We do however anticipate incurring costs given the need to make procedural and system changes in order to meet the specified requirements, along with associated training of staff and contractors, and potentially the need to recruit additional resource to administer the associated

Respondent	Response	Rationale
		activities.
Western Power Distribution	Yes	<p>Cost will be incurred in making the necessary company policy document changes, amending company systems and processes, and to briefing / training staff on the revised requirements.</p> <p>The four WPD licence areas cover a large geographical area, stretching from the Isles of Scilly in the South West to Mablethorpe on the East Coast, and including South Wales and the West Midlands. WPD has a very large number of staff (planners, jointers, technicians etc) who are involved with the "P283" process i.e. who design, install and commission customer connections, and these individuals are all dispersed across our patch in around 150 separate teams.</p> <p>The cost of amending company systems and processes and briefing / training staff is not trivial.</p> <p>The costs will be one-off.</p>

## Question 5: Do you agree with the proposed implementation approach for CP1458 v2.0?

### Summary

Yes	No	Neutral/No Comment	Other
5	6	0	0

### Responses

Respondent	Response	Rationale
British Gas	Yes	-
E.ON Energy Solutions	No	We believe that it would be prudent to await the completion of P272, before implementing this change as we are mindful of the resource constraints that both this CP and P272 implementation create.
GTC	No	It is unlikely that there is sufficient lead time to ensure that the required systems updates have been undertaken prior to the proposed implementation date. Notwithstanding the above it is likely that temporary administrative and process fixes may be able to address the obligations until bedding in the new systems.
IMServ	Yes	-
Northern Powergrid	Yes	We agree that the process needs to change to facilitate a more efficient way of LDSO confirming commission status and evidence to MOA and that the proposed changes support this.
ScottishPower Energy Retail	No	Timescales are too short given the potential systems and FTE impacts.
ScottishPower	No	As indicated in our response to Q1, we believe that CP1458 should be implemented at the same time as the proposed new commissioning data flow that Elexon are proposing to introduce into the MRA process.
SSE Energy Supply Limited	Yes	-
TMA Data Management	Yes	-
UK Power Networks Operations Ltd	No	Originally, commissioning documents provided by an LDSO under P283 guidelines were to be fulfilled upon request from the HHMOA and processes were designed to follow this paradigm. However CP1458 is being designed so that the LDSO pushes all metering

Respondent	Response	Rationale
		<p>documentation to HHMOA. This in effect, requires an entirely new solution that requires proactive processes rather than the current reactive systems we have implemented. We feel that this needs to be taken into consideration when determining an implementation date of these guidelines.</p> <p>Also, if this change proposal is discussed and agreed at the SVG on Tuesday 6 September, the proposed implementation date would be just 8 weeks later. This relatively short window would not afford sufficient time to allow amendment our internal procedures and associated business change activities in order to meet the new requirements.</p> <p>Our recommendation is the implementation date should be no earlier than February 2017.</p>
Western Power Distribution	No	<p>In our response to the previous consultation we commented that the proposed implementation date of only 8 weeks after the SVG decision date was insufficient to make the necessary company policy document changes, to amend company systems and processes, and to brief / train staff on the revised requirements. We suggested that the implementation date should be no sooner than the November 16 release i.e. 6 months after the decision date, on the basis that the latter remained the same.</p> <p>The implementation data should be the first available release which occurs not less than 6 months after the SVG decision date.</p>

## Question 6: Do you have any further comments on CP1458 v2.0?

### Summary

Yes	No
3	8

### Responses

Respondent	Response	Comments
British Gas	No	-
E.ON Energy Solutions	Yes	<p>We wanted to provide some additional feedback regarding the flow diagram that has been produced to support CP1458:</p> <p>5.2.2.A.1 - We have concerns regarding the timeliness of the notification of energisation flows received from the DNO. Historically we do not always receive these in a timely manner, if at all. Will HHMOA's 16 day deadline start from the point that the energisation flow is received from the DNO?</p> <p>5.2.2.A.4 - We are concerned about the robustness of 'on the date requested or agreed with Supplier'. This could open the HHMOA to further unachievable deadlines for commissioning. We believe this should be worded in line with DNO instructions, specifically, 'At the earliest opportunity but no later than 16 WD after energisation.'</p> <p>5.2.2.A.6 – We lack clarity as to what will be deemed as 'acceptable' defects or omissions that prevent commissioning.</p> <p>5.2.2.A.13 – Please can the wording be clarified, as we are unsure as to whether 'Within 5WD of Within 5WD' is correct.</p>
GTC	No	None
IMServ	No	-
Northern Powergrid	No	-
ScottishPower Energy Retail	Yes	<ol style="list-style-type: none"> <li>1. Increased LDSO commitment to the original P283 change is required before timescales can be imposed.</li> <li>2. Commissioning responsibility could be returned to MOAs for LV cutout connected supplies where the CTs are clearly visible and ratios can be confirmed via comparison tests between primary and secondary currents.</li> </ol>

Respondent	Response	Comments
ScottishPower	No	-
SSE Energy Supply Limited	No	-
TMA Data Management	No	-
UK Power Networks Operations Ltd	Yes	There has been recent discussion around the re-design of a dataflow to incorporate P283 information. As an LDSO we see the current provision of P283 information under CP1458 as an interim solution. Much of the systems and processes required to fulfil CP1458 will need to be changed or will become obsolete with the introduction of an electronic document flow. We also believe that such a dataflow is a key enabler to achieving the requirements defined in CP1458.
Western Power Distribution	No	-

**BSCP514**

Respondent	Location	Comment
Western Power Distribution	5.2.2	Suggest "Installation" is changed to "General"
Western Power Distribution	5.2.2.8	Suggest "Meter Systems that include" is deleted i.e. so that the sentence in brackets says (Go to section 5.2.2.A for the Commissioning of Measurement Transformers)
Western Power Distribution	5.2.2.A	Suggest "Meter Systems that include" is deleted i.e. so that the section is titled "Commissioning of Measurement Transformers"
Western Power Distribution	5.2.2.A.4	Covered by 5.2.2.8.  If it is to be retained suggest that "but no later than 16WD after energisation" is deleted.
Western Power Distribution	5.2.2.A.5 - 5.2.2.A.8	Change "defect/omission" to "defect / omission (other than non-receipt of complete Commissioning information from the LDSO)"  Suggest that these sections would sit better in Section 5.2.2 e.g. as part of Section 5.2.2.9
Western Power Distribution	5.2.2.A.9	This activity has to be completed no later than 21WD after energisation and consequently there is no allowance for the time between an LDSO sending the information (in 5.2.2.A.3) and the HHMOA receiving it (i.e. it may be sent out overnight). Suggest this is changed to
Western Power Distribution	5.2.2.A.13	Suggest that this sections would sit better in Section 5.2.2 e.g. as a new Section 5.2.2.13
Western Power Distribution	5.3.5.A	Suggest new section is included - see Question 2 d) for details.
Western Power Distribution	6.3.4	Is footnote 70 relevant? - see Question 2 e) for details.
Western Power Distribution	6.3.4 and 6.3.5	Footnotes 70 and 72 refers to 6.2.2.A – there is no 6.2.2.A.

**BSCP515**

Respondent	Location	Comment
Western Power Distribution	3.3.A	Suggest "Commissioning" is changed to "Commissioning of Measurement Transformers".

Respondent	Location	Comment
		<p>Suggest "the appropriate Codes of Practice and" is deleted so that the sentence reads "...then Commissioning procedures need to be followed in accordance with Code of Practice 4."</p> <p>Since BSCP515 relates solely to licenced distribution then suggest that in the second paragraph "a BSC Party (LDSO or other) then MOA commissioning will take place" is replaced with "the LDSO then the MOA will carry out the Commissioning procedures"</p>