Question 1: Do you agree with the CP1458 proposed solution?

Respondent	Response	Rationale	ELEXON Response
Association of Meter Operators	No	• There is a benefit in being clearer about the timescales associated with Commissioning. However this CP does not take account of all the practical variances that exist in reality. • The CP also goes beyond the scope of the changes envisaged by P284 Commissioning by proposing changes to when the D0150/D0268 is sent. The proposal will reduce the level of actual data entering settlements by requiring the MOA to only release the MTD after completion of satisfactory commissioning, with the timescales suggested that will mean after the initial settlement run. This will also materially impact Suppliers (and Distributor) billing.	• Currently the BSC states that Commissioning has to be done before the Metering System becomes effective, that reasonable endeavours must be made to do so and that it is done on the date as requested by the Supplier. This currently does not allow for any exceptions when Commissioning is delayed. The proposed timescales provide more time than is currently available while still preventing a negative impact on Settlement (should the Metering System start to record load before Commissioning has been completed). Currently because there is no specific timescale, Parties are using their own judgement as to what a reasonable time is to complete Commissioning. In many cases this is leaving equipment without Commissioning for months at a time (the P283 TAPAP revealed this is anything from 2-12 months) and while the MPAN is live in Settlement. This presents a high risk. • There have not been any changes made to when any of the file flows are sent. The timescales have been inserted to run along side current steps in the BSCPs.
British Gas	Yes	British Gas supports the implementation of this change	

Respondent	Response	Rationale	ELEXON Response
		proposal as it adds timelines to work that is already done and is required.	
E.ON Energy Solutions	Noez	• Whilst we are in agreement that there needs to be an agreed set of arrangements to resolve the issues around commissioning, we are not in favour of the proposed solution and timescale of 26 working days. We feel that the timescale is unrealistic in some cases, and could be detrimental to both Supplier and Supplier Agent compliance. Whilst we recognise the need for a robust timescale to improve efficiency of the process, we believe that 26 days would be very challenging at best, but in many cases maybe unachievable.	• The timescales were created in version one so that Commissioning is done before the MPAN is live in SMRS/ECOES. This has been changed in version 2 to the physical energisation rather than the date in SMRS/ECOES. If the BSCPs are followed correctly, then Commissioning can be achieved before the MPAN is live/energised in SMRS/ECOES because the flow update should not be done until physical energisation has taken place. Taking that into consideration we feel that these timescales are achievable.
		• In addition, it is unclear how often the escalation routes in this process should be used. There are no explicit timescales stated for such escalations, or indeed how long a HHMOA would be expected to chase for.	• This has been changed to make the process clearer in version 2 of the timescales. The Supplier has the overall responsibility for the Metering System and P283 introduced steps for the MOA to engage with the Supplier regarding the status of the Metering System and if there is a gap in the process (e.g. LDSO not providing records). This step still holds detail about escalation routes to support that while reminding Parties that an escalation process is available where the LDSO is not fulfilling its obligations. The MOA should be engaging with the Supplier regarding

Respondent	Response	Rationale	ELEXON Response
			the status of the Metering System who then will make the decision if they wish to contact the LDSO or raise this with ELEXON.
		• We would also like clarification that meters with no load are deemed exempt from this process – meters with no load are, in our experience one of the major barriers to completing commissioning. Whilst we agree that the commissioning process needs to be improved, we are not supportive of CP1458 as we consider that there are gaps in the processes (as above) and that it sets a timescale which in many cases maybe unachievable.	• Meters with no load are not exempt from this process. If the chosen method of Commissioning does not work then Parties should be choosing an alternative method to fulfil their obligations.
ESP Electricity Limited	Yes	Yes, defined timescales around the submission of commissioning information will improve the settlements process by ensuring commissioning is carried out shortly after energisation and accurate data is entering settlement.	
GTC	Yes	We are supportive of introducing timescales for the P283 process. We do, however, believe this needs to be seen as a back stop rather than firm dates to provide the information. Otherwise connection customers may be adversely affected by delays in receiving a connection. It should also be noted that our preferred solution for the confirmation and provision of commissioning information should be by local transfer between the Distributor and Meter Operator rather than by data flows.	The timescales state that the Commissioning information is transferred for by *Electronic or other method, as agreed.* If a dataflow is introduced and you wish to transfer the information by any other method, as agreed.

Respondent	Response	Rationale	ELEXON Response
Haven Power Limited	Yes	-	
IMServ	Yes	By implementing timescales and allowing LDSO to proactively send commissioning documentation after the meter has been energised we believe the very large volume of e-mail noise will be removed and DNOs will be in a better position to deliver the required results.	
Northern Powergrid	No	• 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. Utilising the energised date from SMRS as the trigger point does not seem to be appropriate as BSCP514 states that the last step in the process is to update the status in SMRS and at that point all metering equipment should be installed and commissioned. Utilising a logical data item to instigate a physical process doesn't currently work and would need to be addressed as part of this change. In addition, the data item can be updated retrospectively which impinges on the proposed process further.	Yes the update to SMRS is the last step in the process, and if all Parties are following the process as they should, then Commissioning will be completed before this update. However, as was evident in the recent P283 TAPAP this is not happening. There has been a difference of 12 months at worst between the live date in ECOES and the date of the check and the equipment had still not been Commissioned. The date can be updated retrospectively up to 18 months, if the update is done as it should, this should not be a problem. However, version 2 of the timescales now changes the deadline to physical energisation rather than a logical data item as suggested.
RWE Npower	No	In a perfect world everything seems fine, however: • On bulk LV (ACB) and HV supplies, we as MOP cannot commission the meters until there is sufficient prevailing	• Commissioning can be completed even when there is no load. If the chosen method of Commissioning does not work then Parties should be choosing an alternative method

Respondent	Response	Rationale	ELEXON Response
		load. This is completely under the control of the customer and almost always takes longer than 16WD after energisation. Under these proposals MOP would be penalised through no fault of its own. • Also, what are the penalties when DNO doesn't provide CT / VT test results, this process simply has a continuous loop with no break out point? The BSCP does state in accordance with COP 4 which says "all reasonable endeavours" must be undertaken to commission however "reasonable endeavours" is not clearly defined anywhere so this is debatable.	to be able to fulfil their obligations. • This has been changed to make the process clearer in version 2 of the timescales. The Supplier has the overall responsibility for the Meter System and P283 introduced steps for the MOA to engage with the Supplier regarding the status of the Meter System and if there is a gap in the process (eg LDSO not providing records). This step still holds detail about escalation routes to support that while reminding Parties that an escalation process is available where the LDSO is not fulfilling its obligations. The MOA should be engaging with the Supplier regarding the status of the Meter System who then will make the decision if they wish to contact the LDSO or raise this with ELEXON. So the ultimate penalty could be a non-compliance which could be raised with the PAB for justification by the relevant Party. The BSCP changes will add clarity to "reasonable endeavours".
		• Neither the timescales diagram or the BSCP redline itself gives any mention to the risk element of P283. Are the same timescales/processes to be followed if the MOA deems the site to be low risk or high risk? If this is the case then the risk element seems negated as there is no	• Currently the engagement between the MOA and Supplier should already be happening to discuss risk levels of each site where there has been an omission or defect that has prevented Commissioning. The process of prioritising sites

Respondent	Response	Rationale	ELEXON Response
		distinction. It is argued that the timescales for the escalation process need to reflect the risk to allow all parties to prioritise accordingly.	is a process and agreement between both Parties and each individual situation, this is not something that ELEXON will dictate or detail in a BSCP. The Supplier is ultimately responsible so they will make the decision around any escalations to ELEXON etc Note it was also revealed with the recent P283 TAPAP that is most cases, this engagement not happening between the MOA and Supplier as it should, so this needs to be improved which can only be done by the relevant Parties.
		• Does this obligate us to re-attend site to commission within 16 working days of energisation, if commissioning was unsuccessful at the time of install? If so, then we do not think that this is realistic – and it certainly was not discussed in the working group.	• Sites should be Commissioned before 16WD after energisation, that is the obligation. Parties need to achieve that in any way they can.
ScottishPower	No	• 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.	• The '16WD after energisation' is a no later than. It is not saying it should be done after energisation. This is the latest it can be done. If Parties can Commission earlier, then that is what they should be doing.
		• The proposed timescales indicate that it acceptable for a supply to remain unmetered for up to 16 days after	• The timescales do not indicate that this is acceptable. Commissioning of installed equipment should be done no later than 16 WD after energisation at which time all of

Respondent	Response	Rationale	ELEXON Response
		energisation.	the equipment will have been installed. Version 2 has been changed to physical energisation for clarity.
		• The MOA escalation loop is infinite if the LDSO fails to respond.	• This has been changed for clarity.
		• 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.	• Commissioning obligations are still on the LDSO if they are the equipment owner, this has not changed. P283 introduced a responsibility for the MOA to 1-use the documents provided by other Parties to perform the overall accuracy assessment pf the Meter System and 2-communicate with the Supplier where there is a gap in the process. This step facilitates both of these steps. The escalation part of the timescales have been edited to provide more clarity.
Siemens Managed Services	Yes	We welcome the proposed introduction of timescales to the commissioning process. As an organisation that it process and task driven this will enable us to clarify when we need to complete various tasks and to monitor their completion. The timescales will also provide the triggers for when we need to chase for information.	
SP Distribution	Yes	We believe that the Commissioning of Measurement Transformers should take place before Energisation on all	

Respondent	Response	Rationale	ELEXON Response
SP Manweb		instances, and as such we do not believe that a 16 day period post Energisation delivers enough mitigation on the impact of Settlement. However in light of a recognised step in the right direction in attempting to introduce a maximum period we agree with this proposed solution.	
SSE Energy Supply Limited	Yes	This solution has been developed by Suppliers, MOAs and LDSOs at the Timescales Work Group. In order to move the issue forward, compromises were made by all parties to establish these timescales, support the principles of P283 and reduce settlement risks. For this solution to work in practice, LDSOs, Suppliers and MOAs will all need to manage their areas of the process so that avoidable distraction and overhead of escalations does not become burdensome. Ultimately, we agree with ELEXON that Metering Systems that have not been commissioned for an extensive period after energisation, as observed by TAPAP checks, is a settlement risk. Placing clear timescales on all industry parties involved in this process is a fair and measured mitigation of this risk.	
TMA Data Management Ltd	Yes	-	
UK Power Networks Operations	Yes	In principle we agree with the spirit of the change proposal.	

Respondent	Response	Rationale	ELEXON Response
Ltd			
Western Power Distribution	Yes, in part	WPD agrees with the principle of the proposed solution but has reservations about some of the detail. It welcomes the timescales being built around the 'live' energisation status and the recognition that prevailing load testing is a legitimate commissioning technique. • WPD is concerned that the BSCP appears to imply that HHMOA should not install the meter or energise the installation if it has not received Commissioning information from the LDSO. • There is also a contradictory note that says that the escalation process for this event is to the Operational Support Manager and then the PAB. The overall intent requires clarification. WPD has reservations about the timescales proposed in the escalation procedure. The LDSO has to send commissioning information to the MOA five working days after receipt of a Supplier escalation. Whilst this timescale is reasonable when the commissioning information has not been sent due to an administrative error, it is insufficient when the commissioning has not been carried out due to a work	• The LDSO and MOA Commissioning are independent of each other. They both have to be completed before the MPAN is live in SMRS. Each obligation is not reliant on the other. • The timescales for commissioning have been separated from the original process steps for clarity. • The escalation part of the process has also been changed to provide clarify enforcing the responsibility of the Registrant. The Supplier has the overall responsibility for the Meter System and P283 introduced steps for the MOA to engage with the Supplier regarding the status of the Meter System and if there is a gap in the process (eg LDSO not providing records). This step still holds detail about escalation routes to support that while reminding Parties that an escalation process is available where the LDSO is not fulfilling its obligations. The MOA should be engaging with the Supplier regarding the status of the

Respondent	Response	Rationale	ELEXON Response
		scheduling error since it is unlikely to be practicable to agree access to site with the customer and to carry out the commissioning testing within a five day timescale. In this event the LDSO would be subject to repeat escalation due to circumstances it has little or no control over. WPD suggests ten days would be more appropriate. WPD also has reservations about the ambiguous nature of "multiple" Supplier escalations. We are concerned that this will result in an inconsistent approach by different Suppliers. We agree that the BSCP should not mandate a specific figure, but feel that the guidance note associated with the appropriate clauses should suggest two numbers, one for escalation to the Operational Support Manager and the second for escalation to the Performance Assurance Board.	Meter System who then will make the decision if they wish to contact the LDSO or raise this with ELEXON. So the ultimate penalty could be a non-compliance which could be raised with the PAB for justification by the relevant Party.
		• There are obviously differing requirements depending upon whether the LDSO owns the Measurement Transformers, however, ownership is not obvious or apparent from the current industry processes, and this can lead to delays in the BSCP process. WPD suggests that the industry considers an MRA change to amend the D0215 data flow by including a data item on measurement transformer ownership i.e. a flag is set is when the LDSO does not own the transformers.	• I believe this has been discussed at IREG and MRA already. This work is not related to the work with these timescales.

Question 2: Do you agree that the draft redlining delivers the CP1458 proposed solution?

Respondent	Response	Rationale	
Association of Meter Operators	No	For the reasons stated elsewhere this will have a detrimental effect on settlements and it misses the fundamental concern that CoP4 is not fit for purpose as it does not provide sufficient clarity to the Commissioning activity.	This change proposal is to add P283 process timescales to BSCP524 and 515. The change and consultation is not for looking at CoP4 and was not issued with the aim to address any concerns that industry has regarding CoP4. This comment is out of scope of this consultation. However, should any Party with to raise an Issue with ELEXON, they are able to do so by providing a clear justification of what needs changing, why and a proposed solution via our change process.
British Gas	Yes	-	
E.ON Energy Solutions	Yes	Whilst we do agree that the redlining delivers the CP1458 proposed solution, we are not in agreement with the timescales and believe there are other outstanding issues as noted in our response to Q1.	
ESP Electricity Limited	Yes	-	
GTC	No	Although we are supportive introducing timescales believe that the draft redlining is too prescriptive of a process. We believe that it is important that parties are allowed to have some discretion as to how the process will be implemented in practice.	Currently the process is not prescriptive and Parties are not Commissioning equipment within a reasonable time or communicating with each other with Commissioning records and status's. This was evident through the recent P283 TAPAP. During the recent P283 TAPAP there was an appetite from

Respondent	Response	Rationale	
			Parties to introduce timescales. There is still some scope for Parties to apply their own discretion with the escalation process with the Supplier after Commissioning has been completed.
Haven Power Limited	Yes	-	
IMServ	Yes	On the whole we agree the redlining delivers, however there are some areas where we do not agree, we appreciate that these points are wider to the process and not necessarily specific to the redlining. 1) If LDSO does not own the Measurement Transformers the redlining says then the MOA must commission in accordance with Code of Practice 4. We struggle to understand the rationale behind this, on the surface it seems an appropriate party couldn't be found so MOA was simply assigned the task by default? Possibly some MOAs have the skills, experience and equipment to commission HV & CT measurement transformers but there are several MOA who are not aligned to distribution business who will find it difficult if not impossible to meet this obligation. Alternative solutions might be to prevent non-accredited third parties from installing Measurement Transformers i.e. organisations operating outside of BSCP/COP or place	• CoP4 5.5 states "Where measurement transformers are not owned by a BSC Party the Registrant, via its appointed MOA, shall be responsible for the Commissioning of all Metering Equipment." • Before P283 MOAs should have be Commissioning all types of measurement transformers so they still should be able to carry out this work. • Non BSC Parties are allowed to install measurement transformers under the competitions of connections work that Ofgem has been doing. But this should not

Respondent	Response	Rationale	
		responsibility for all Measurement Transformer commissioning with LDSO regardless of ownership. 2) BSCP514 mandates that the MOA must send a D0170 to the LDSO requesting System Related Details (the D0215) we believe that this step should be optional, if the MOA doesn't want or need the information in the D0215 then they can chose not to send the D0170. At IMServ our working practise has been built around gathering information from sources which do not include the D0215, we appreciate that there are planned changes for the D0215 but in its current format we ignore the information because it's deemed unreliable and of no practical use.	stop BSC Parties from fulfilling their BSC obligations. • IMserv should be working in line with the BSCPs. • The planned changes to the D0215 are not related to the work that ELEXON are doing, this has been raised by Npower and a decision was made not to include any P283 changes with this.
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.	-
RWE Npower	No	See response to question 1.	-
ScottishPower	No	Do not agree with CP1458 proposed solution.	-
Siemens Managed Services	Yes	-	
SP Distribution	Yes	-	

Respondent	Response	Rationale	
SP Manweb			
SSE Energy Supply Limited	Yes	-	
TMA Data Management Ltd	Yes	-	
UK Power Networks Operations Ltd	No	The red lined drafting does not elaborate on circumstances whereby Suppliers can energise Metering Points, in SMRS, retrospectively prior to the 16 working days stated.	• The timescales are in relation to physical energisation. This has been changed in version 2 so should clear this concern.
Western Power Distribution	No	• The BSCP has been written such that installation & commissioning of the meter is consecutive to the commissioning of the measurement transformers. Because commissioning of the latter can be completed post-energisation, the BSCP is effectively saying that customer's consumption can be unmetered for a significant period of time following energisation. • This cannot be correct. The BSCP should be amended so that commissioning of the meter and measurement transformers is carried out in parallel, with the former having to be completed by energisation. • The rows/items are nominally laid out in chronological	• The BSCP says that Commissioning of each piece of equipment should not be done any later than 16WD after physical energisation. This is not saying it should not be done sooner. It is encouraged that it is done asap. • Both the LDSO and MOA have the same deadline. The timescales for Commissioning of the equipment is designed to run in parallel, they are both required to be done before energisation and are not reliant on each other.

Respondent	Response	Rationale	
		order. However, a number of the new insertions are substantially out of position, which makes the process a little unclear to follow. There are a number of "go to" actions for the HHMOA which reside in a row/item which is supposed to be an LSDO internal process, which is a little confusing. Please see specific comments in the "CP Redlined Text" section below.	• This have been amended for version 2.

Question 3: Will CP1458 impact your organisation?

Respondent	Response	Rationale	
Association of Meter Operators	Yes	I suspect these proposals will have a material impact on the operational process of all affected parties. On that basis the timescale of June 2016 seems unrealistic.	This comment has been taken on board and the date will be pushed back.
British Gas	Yes	We have identified impacts to our internal process and our third party HHMOPs.	• This process should already be happening but we appreciate that monitoring of this process will need to be refined to run in line with the timescales.
E.ON Energy Solutions	Yes	• There potential impacts from both a Supplier and HHMOA perspective, in some instances such as new connections it will not always be possible to complete the process within the time limit. This would leave both the Supplier and HHMOA in	• The site should not be energised in ECOES/SMRS before the equipment is physically energised and the equipment has been installed and Commissioned. The timescales give until 16WD after physical energisation. This is achievable

Respondent	Response	Rationale	
		breach. For some new connection sites this will be unachievable due to the site having its metering installed before supply is energised. In some cases this could be a number of months in advance.	and will not hinder any other Party obligations.
		• It may be possible to carry out load injection on non-consuming sites to complete these tests but this is not always possible, either due to site characteristics (HV load injection isn't possible) or the LDSO may have installed Measurement Transformers in such a way that there's no physical gap to be able to fit load injection equipment.	• MOAs do not need to Commission measurement transformers therefore only need to inject into the secondary circuit.
		• Where a HHMOA is unable to inject load it is not possible to commission these sites until such time as they are live.	• The timescales will allow 16 WD for prevailing load Commissioning.
		• We are also concerned that that this CP introduces an expectation for HHMOA to verify the certification received from the LDSO. Our engineers have raised reservations about their ability to translate and sign off a document on behalf of a third party due to a lack of a standard	• MOAs should be using the LDSO records to perform the overall accuracy assessment of the Meter System. MOAs are not being asked to sign off LDSO records. If the record they are given does not enable the assessment then of course they should then be going back to LDSOs because they do not have a valid complete part

Respondent	Response	Rationale	
		approach across LDSO's. • Processes from a HHMOA perspective would have to be amended and aligned if the CP were to be implemented, and as previously stated in answer to Q1 the timescales are particularly challenging. • CP1458 may be improved by introducing a standard approach across parties for receipt of data updates. Industry may benefit (and settlement therefore improved) from a consistent approach by parties as to when updates should be received (e.g. daily, weekly etc). Without a standard approach, HHMOA will still have to manage different processes for each supplier. This potentially adds cost and doesn't address the risk to settlement.	• This process should already be happening but we appreciate that monitoring of this process will need to be refined to run in line with the timescales. • The next step is to look at a dataflow for the communications to introduce consistency and efficiency.
ESP Electricity Limited	Yes	Yes, as a LDSO providing commissioning information to industry parties, the CP will impact our organisation from an administration perspective.	This process should already be happening but we appreciate that monitoring of this process will need to be refined to run in line with the timescales.
GTC	Yes	CP1458 is likely to have significant impacts on our organisation, we will have to create another database to hold the data as required by the process. We do not	This process should already be happening but we appreciate that monitoring of this process will need to be refined to run in line with the timescales.

Respondent	Response	Rationale	
		currently record this data in such a way that we would be able to send it in the format required by this change proposal. We believe that there are substantial cost implications in being required to hold this data in the necessary format. Further to the point raised above that would require a new system to be built there are also concerns that moving the information as we currently hold it into the new system so that it can be send in the format required will be a considerable and resource heavy piece of work.	Currently the format is not prescriptive and this CP does not introduce a standard format for communications. There are however templates and example already available in the CoP4 Commissioning guidance.
Haven Power Limited	Yes	Our current process will require updating, this should take minimal time to implement. The changes will then be briefed to staff involved directly with the process. This will impact our metering staff who currently monitor the P283 inbox. This impact is expected to be minimal	This process should already be happening but we appreciate that monitoring of this process will need to be refined to run in line with the timescales.
IMServ	Yes	We believe the most significant impact to MOA is the new requirement on MOA to complete commissioning within 16WD of it being energised in SMRS; we would like to raise the following points… 1) The BSCP says that the 16WD clock starts based on the ES in SMRS; however from a practical perspective we believe MOAs will start counting from the ES date in their respective databases, they won't be looking in SMRS. In most instances we expect this to be a moot point as in theory the MOA	

Respondent	Response	Rationale	
		energisation and SMRS dates should match, however we believe there are instances where this is not the case and SVMS is outside of the MOAs control. 2) While we agree that implementing a deadline for the completion of MOA commissioning is a step in the right direction experience has taught us that we will endeavour to complete 100% of commissioning jobs but it won't always be possible to achieve this and not with 16 working days. For example, if commissioning could not be completed at the point of meter install we then to return to site, if we are returning we require either sufficient customer load to commission or permission from the customer to power down so we can inject load (not possible for HV). If customer refuses a power-down or if physical access is restricted then MOAs will fail to meet the 16 WD deadline. We think there should be consideration of these issues when auditing, possibly a percentage could be used i.e. 95% completed with 16WD, or valid exceptions where evidence of the MOA attempts to commission can be produced.	• If a Parties current chosen method of Commissioning then an alternative needs to be found to fulfil their obligations. Currently the BSC states that Commissioning has to be done before the Meter System becomes effective, that reasonable endeavours must be made to do so and that it is done on the date as requested by the Supplier. This currently does not allow for any exceptions when Commissioning is delayed. The proposed timescales provide more time than is currently available to give some allowance for these instances, while still preventing a negative impact on Settlement (should the Meter System start to record load before Commissioning has been completed).
Northern Powergrid	Yes	The change will require internal process amendments in order to ensure compliance. As we feel there are still some amendments to make to	This comment has been taken on board and the date will be pushed back.

Respondent	Response	Rationale	
		the proposed red lined changes of BSCPs followed by the time needed to follow due process for party agreement, the implementation date of 30th June 2016 would likely be too soon to implement the subsequent internal process changes required.	
RWE Npower	Yes	See response to question 1.	
ScottishPower	Yes	Additional monitoring, record keeping and follow up will be required.	Noted. Thank you for your comment.
Siemens Managed Services	Yes	We will need to develop reports to monitor the timescales and train out the timescales to the Back Office team.	This process should already be happening but we appreciate that monitoring of this process will need to be refined to run in line with the timescales.
SP Distribution SP Manweb	Yes	As a DNO This change will impact our organisation with further training for operatives to make them aware of any changes in timescales, there may also be tweaks to internal systems and control measures required to ensure accuracy in monitoring delivery. We would advocate a tighter regime whereby the energisation at site cannot occur until there is evidence of the commissioning having occurred.	Noted. Thank you for your comment.
SSE Energy Supply Limited	No	-	
TMA Data Management Ltd	No	-	

Respondent	Response	Rationale	
UK Power Networks Operations Ltd	Yes	Our business processes will need to be updated and training material produced. All staff involved in the process will be required to attend training sessions. The information systems developed to operate the P283 process will need structural change and new reports developed to enable operation, management and monitoring of the revised process. Managing and operation of a more complex process will require additional staff resources. Restructuring of the current management and performance reporting of our P283 subcontractor.	Noted. Thank you for your comment.
Western Power Distribution	Yes	Whilst WPD has had an obligation to commission the metering CTs & VTs it owns or adopts since November 2014 there has not been any mandated timescale for completing this activity. 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.	Noted. Thank you for your comment.

Question 4: Will your organisation incur any costs in implementing CP1458?

Respondent	Response	Rationale	
Association of Meter Operators	Yes/No	-	-
British Gas	Yes	Full costs analysis has yet to be completed.	Noted. Thank you for your comment.
E.ON Energy Solutions	Neutral	There will be some small OPEX expenditure required, but we do not envisage this to be significant in nature. This has yet to be quantified.	Noted. Thank you for your comment.
ESP Electricity Limited	Yes	There will be no impact on our IT systems, but there will be additional administration costs in dealing with external parties to expedite the commissioning information.	DNOs should already be obtaining commissioning records from their contractors. It is currently a BSC requirement for the DNO to pass these to the MOA and for records to be kept for the lifetime of the Metering System. This process should already be happening but we appreciate that monitoring of this process will need to be refined to run in line with the timescales.
GTC	Yes	The costs are difficult to quantify but there will be development costs, set up costs and sourcing the data and then arranging for this to be input into the system. These costs will certainly be into the £ 000's and could be more depending on the development required. It is not clear, at present, the extent of the ongoing operational costs for having this solution in place.	Noted. Thank you for your comment.
Haven Power Limited	No	-	
IMServ	Yes	All process change has an overhead; in this instance we	Noted. Thank you for your comment.

Respondent	Response	Rationale	
		believe the cost will be low and a one-off.	
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.	Noted. Thank you for your comment.
RWE Npower	Yes/No	Unable to answer at this moment.	Noted. Thank you for your comment.
ScottishPower	Yes	The answer to Question 3 above will require systems changes and will have an additional FTE requirement to administer.	Noted. Thank you for your comment.
Siemens Managed Services	Yes	One-off costs: Develop reports to monitor the timescales and train out to the Back Office team. Possible additional systems amendments to support the implementation of these timescales, as yet these amendments have not been Impacted Assessed. On-going costs: Running of monitoring reports.	Noted. Thank you for your comment.
SP Distribution SP Manweb	Yes	While we have indicate Yes in our response, we do not anticipate a significant level of cost as a result of this proposal.	Noted. Thank you for your comment.
SSE Energy Supply Limited	No	-	
TMA Data Management Ltd	No	-	
UK Power Networks	Yes	This change will have associated costs; however, we are	Noted. Thank you for your comment.

Respondent	Response	Rationale	
Operations Ltd		unable to provide details at this time.	
Western Power Distribution	Yes	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. 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. The costs will be one-off.	This process should already be happening but we appreciate that monitoring of this process will need to be refined to run in line with the timescales.

Question 5: Do you agree with the proposed implementation approach for CP1458?

Respondent	Response	Rationale	
Association of Meter Operators	No	While I fully appreciate and support the desire to introduce timescales associated with Commissioning and have suggest this over a long period. The proposals are simply not fit for purpose and will lead to further ambiguity and challenges within industry further undermining the intent of P283 to improve the quality of	Thank you for your comment. We believe that these timescales will ensure that Commissioning is completed within a reasonable timescale whereas at the moment it is not.

Respondent	Response	Rationale	
		data entering settlement.	
British Gas	Yes	-	
E.ON Energy Solutions	No	• We do not agree with the proposed implementation of this CP. For some new connection sites this will be unachievable due to the site having its metering installed before supply is energised. In some cases this could be a number of months in advance. It may be possible to carry out load injection on non-consuming sites to complete these tests but this is not always possible, either due to site characteristics (HV load injection isn't possible) or the LDSO may have installed Measurement Transformers in such a way that there's no physical gap to be able to fit load injection equipment. Where a HHMOA is unable to inject load it is not possible to commission these sites until such time as they are live. This would require a revisit to complete the commissioning process. • It has not explicitly been explained whether an exemption will be granted in these cases, so we can only assume that it will not be, in which case	• If the Meter is installed before energisation then Commissioning can be competed before the 16 WD after energisation. • MOAs should not be Commissioning CTs/VTs this is not their obligation. • 16WD after energisation provides opportunity to inject on prevailing load. • Your assumption is correct, an exception is not granted in these cases.

Respondent	Response	Rationale	
		this would make the timescales difficult if not impossible to achieve. • Our concern is that by setting a 26 working day limit this sets an artificial and potentially unachievable limit for HHMOAs to achieve in all cases. HHMOAs could confirm to Suppliers within 26 working days whether commissioning has been successful but in some cases such as those described above, the likelihood that commissioning will have been completed within the timescale would be low.	• The timescales give opportunity to Commission both via injection testing and prevailing load.
ESP Electricity Limited	Yes	The June 2016 release is the next available release that can include the CP.	
GTC	No	Given our belief that the process is too prescriptive and to be administered in the form that has been proposed would require system developments we cannot support the implementation date that has been proposed in the consultation document.	This comment has been taken on board and the date will be pushed back.
Haven Power Limited	Yes	-	
IMServ	Yes	Timescales are very short but we believe we can meet them.	This comment has been taken on board and the date will be pushed back.

Respondent	Response	Rationale	
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.	Noted. Thank you for your comments.
RWE Npower	Yes	-	
ScottishPower	No	Timescales are too short given the potential systems and FTE impacts.	This comment has been taken on board and the date will be pushed back.
Siemens Managed Services	Yes	-	
SP Distribution SP Manweb	Yes	-	
SSE Energy Supply Limited	Yes	We are supportive of June 2016 implementation and do not see any reason for the existing arrangements, which are not having the desired effect, to be maintained beyond the next available release.	Noted. Thank you for your comments.
TMA Data Management Ltd	Yes	-	
UK Power Networks Operations Ltd	No	Our understanding is CP1458 will be discussed at SVG, scheduled for the 3 May. This will lead to a very short window to finalise the necessary changes to our IT reporting and to enter into arrangements with our contractors regarding the requirement for additional short notice appointments. The November 2016 release	This comment has been taken on board and the date will be pushed back.

Respondent	Response	Rationale	
		would seem more appropriate.	
Western Power Distribution	No	The CP Assessment Report will be presented to SVG for decision on 3 May 16. The proposed implementation date is 30 Jun 16, which is 8 weeks later. This is insufficient time to make the necessary company policy document changes, to amend company systems and processes, and to brief / train staff on the revised requirements. The implementation date should be no sooner than the November 16 release.	This comment has been taken on board and the date will be pushed back.

Question 6: Do you have any further comments on CP1458?

Respondent	Response	Comments	
Association of Meter Operators	Yes	There is a fundamental concern that the operational activities expected under CoP4 Commissioning are not clearly defined within the CoP4. Therefore at every occasion of discussion Commissioning we come back to this fundamental weakness. I have participated in many meeting where the consensus is that CoP4 is not fit for purpose yet there is reluctance by ELEXON representatives to recognise this fundamental flaw. CoP4 needs to be reviewed to thoroughly review and refresh the BSC requirements for Commissioning, until	ELEXON requires a clear justification of why CoP 4 is not fit for purpose. ELEXON are not reluctant to perform a review, a justification has yet to be received. Should any Party with to raise an Issue with ELEXON, they are able to do so by providing a clear justification of what needs changing, why and a proposed solution via our change process.

Respondent	Response	Comments	
		that is done we will not progress.	
British Gas	No	-	
E.ON Energy Solutions	Yes	Whilst we appreciate from a settlements perspective that the current situation cannot continue, we are concerned that this CP1458 as drafted still has a number of questions outstanding e.g. number of time an escalation route should be tried etc. The CP may therefore benefit from a further review and or a trial period whereby a consistent approach is adopted across parties to better determine an appropriate timescale for completion of these activities.	It has been left to the discretion of the Registrant/Supplier who has the overall responsibility of the site to decide based on the information provided by the MOA (on each individual case) as to how to escalate. The escalation loop has been removed to support this and provide clarity.
ESP Electricity Limited	Yes	• As a LDSO, we are often asked for CT certificates & commissioning information from MOPs and/or Suppliers way in advance of energisation of the metering point e.g. we received a request in November 2015, demanding a response within 20 days, yet, still in March 2016 the site has not been energised. Adding a timeline following energisation would improve the process and prevent needless requests from external parties. • We are often asked for "Part 1 Commissioning records" which originate from the CT manufacturer. As we have no direct dealings with the manufacturer and the CTs are installed by external contractors, we are rarely provided	• Thank you for your comments. • It has always been an obligation to maintain the CT/VT manufacturer certificates, even before Modification P283.

Respondent	Response	Comments	
		with this information and find it difficult to obtain. • We are often asked for CT certificates and commissioning records for sites that have been energised for some years and where our external contractors have left site. With the proposed change's objective not to cater for retrospective provision of information, we would greatly support that intention. • Finally, we believe that MOPs should not install CT metering prior to energisation, as commission and proving cannot be carried out. Often we have no record of the MOP returning to site and carrying out the testing in these instances, and requests for the MOP to re-attend are common but often declined.	• As mentioned above it has always been an obligation to maintain the CT/VT manufacturer certificates so it is expected that you will receive requests for these records for new connections before P283. For sites connected between 6 Nov 15 and when CP1458 becomes effective, records should still be passed between oParties because this is the obligation that was introduced with P283. CP1458 now states in what timescale. • MOPs are able to perform commissioning even when the site has no load. Sites should also not be left without commissioning being performed. Please liaise with the Supplier if this is an issue who can then escalate to ELEXON if needed.
GTC	Yes	We are aware that this is something that issue is also being progressed under the MRA and do not believe that, at present, proper consideration has been given as to how each of the changes will affect the other code. We would like to see a more holistic, joined up approach to	I believe this refers to a change that was proposed to the MRA for amendments to the D0215 flow. This is not related to CP1458.

Respondent	Response	Comments	
		how commissioning details are recorded and communicated between parties.	
Haven Power Limited	Yes	• We would like to see step 3.3.A.9 include a supplier copy so that we can keep accurate record of resolved escalations. We are proposing to copy in our OSM to second escalations to LDSO's. This we hope will improve responses and reduce the risk to settlement. • In refining the process we would welcome and support the creation of a flow for all industry parties to use. This we feel would improve auditing and document control.	• Noted. This will be considered with version 2. • If this is a practice you wish to agree with your OSM please do so. However, this step will not be written onto the BSCPs. • This is the next step after CP1458.
IMServ	Yes	While we approve of the changes in CP1458 it should be noted that when P283 was first conceived our expectation was that the LDSO would make accurate CT/VT information available to meter operators BEFORE the meter was fitted, the idea being that the MOA could use the information to program the correct CT/VT ratios into the meters. If CP1458 is implemented it means that this significant benefit will not be realised because the LDSO will not send their commissioning information until some weeks after the meters has been installed and programmed. We understand why this change is necessary but it's	During the workgroup it was considered to create the MOA commissioning timeline following the DNO passing the part 1 records but it would then mean that the MOA is reliant on the DNO to be compliant. To avoid reliance of compliance of each Party/Agent the timelines were created separately and to run in parallel.

Respondent	Response	Comments	
		disappointing that it isn't the full solution we hoped for.	
Northern Powergrid	No	-	
RWE Npower	No	-	
ScottishPower	Yes	1. Increased LDSO commitment to the original P283 change is required before timescales can be imposed. 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.	It is hoped that timescales will improve LDSO commitment because their activities will be assigned to a BSCP timeline. Noted. Thank you for your comments.
Siemens Managed Services	No	-	
SP Distribution SP Manweb	Yes	We note in the redlining text that the appropriate method of communication is 'electronic or other method as agreed', we would prefer to see communication being an automated data flow in the longer term.	The creating of a data flow is the next step following the timescales. 'electronic or other method as agreed' was placed to allow for the transition between email and the flow.
SSE Energy Supply Limited	No	-	
TMA Data Management Ltd	No	-	
UK Power Networks	Yes	Although CP1458 clearly states 'for the avoidance of	The obligations are not changing.

Respondent	Response	Comments	
Operations Ltd		doubt, this CP is not intended to be retrospective' however this is misleading. Potentially, there are a number of incidents (e.g. Change of MOA) whereby there is a requirement to establish if the Metering System is commissioned. In the case of older sites this is likely to lead to arranging customer outages.	These timescales will apply to any new connections that take place after the implementation date and not any new connections prior to the implementation date.
Western Power Distribution	No	-	

CP Redlined Text

BSCP514

Respondent	Location	Comment	
Association of Meter Operators	5.2.2.8	The proposed BSCP515 creates a different section for new metering installation with measurement transformers. BSP514 does not, yet this section will therefore need to be modified to reflect the differences	This has been amended.
Association of Meter Operators	5.2.2.8	There is a conditionality identified: who owns the metering equipment? How is the MOA meant to know the ownership of the measurement transformers? As part of the MRA SPF096 review it has been proposed that the ownership could be added to the D0215 as the	CP1458 does not change anything relating to this question.

Respondent	Location	Comment	
		Distributor will know whether they own the Measurement Transformers or not	
Association of Meter Operators	5.2.2.10	Should the when be on receipt and the when – where commissioning information has been received… Otherwise the MO could just 'hold' the information for up to 21 days	Noted. Thank you for your comments.
Association of Meter Operators	5.2.2.20 & 6.2.2.A.23	The D0268 is only sent when the Commissioning has been completed successfully. This will significantly impact on the volume of actual data entering settlement. Making this strep conditional on completion of all the commissioning means that provision of MTD to the parties, notably the DC will mean that no data will enter settlement for this metering system, except estimates based on an EAC and a default profile. Despite all the concerns about Commissioning this change will result in actual data not being provided for many metering systems until well after the SF run. This cannot be a sensible approach.	No changes have been made to the timescale and order of the file flows with CP1458. For clarity the commissioning timescales are now in their own section so not to confused the original BSCP sections.
Association of Meter Operators	5.3.4 Reconfigure or Replace Metering System (No Change of Measurement Class)	There are no changes identified in this section although this requires similar change to account for CoP4 commissioning where there is a material change to the metering equipment, such as change of CTs	Noted. Thank you for your comments.

Respondent	Location	Comment	
Association of Meter Operators	5.3.6 Change of Feeder Status – Energise Feeder	The lack of clarity in CoP4 and in BSCP514 & 515 mean that the addition (and/or removal) of a feeder appear t have no requirement for CoP4 Commissioning. This can not make sense when the additional of a feeder will undoubtable mean a material change to the metering equipment	There are obligations for upgrades to existing connections in the BSCPs.
Northern Powergrid	5.2.2.8	Although our processes will be to commission the metering equipment using an injected phantom load at installation and before final energisation wherever possible there will be occasions where this cannot be done due to technical, operational or practical reasons. On these occasions we would be reliant on sufficient prevailing load to fully commission. As the level of prevailing load is out of our control it could be longer than 16 working days when the customer can apply sufficient load. If this was the case we would be in breach of the BSCP. Though we understand the rationale behind the 16 WD cut off period it would not be fair to be penalised in circumstances beyond our control. Therefore, we feel there should be a caveat added to the process that exempts the 16 WD commission requirements in these exceptional circumstances. A suggestion could include the caveat saying the 16 WD time limit being dependent on load of, say, 10% of full load capacity to allow for adequate prevailing load commission.	The 16 WD is realating to energisation in SMRS, not physical energisation. The flow to update SMRS s the last thing to happen in the BSCP and is not reliant on load.
Northern Powergrid	5.2.2.17	The additional proposed text 'but no later than 16WD after energisation status is active in SMRS' should be	The timescales have been changed to no later than 16 WD after physical energisation – they should not be

Respondent	Location	Comment	
		removed. If LDSO has 16WD to commission (on load) this would need a meter to be installed. If the MOA has the same timescales (up to 16WD) to fit the meter this could potentially leave no time for the LDSO to commission the CTs. In any event we would question why the additional proposed text has been added in the first place.	waiting until then to perform Commissioning it should be done as soon as they are able to. The most frequent excuse for not Commissioning the equipment when its been fitted is that there is no load/not energised. This timescale now gives 16WD to perform the Commissioning. Its been added to ensure that Parties perform Commissioning whereas at the moment they are not.
Northern Powergrid	6.2.2.A	BSCP 514 6.2.2.A – New connections with CT's (NHH) Though it is good practice to treat all CT metering the same P283 only applies to HH sites. Therefore, we don't see why amendments have been made to 6.2.2	This is being removed.
UK Power Networks Operations Ltd	BSCP514 6.2.2.A.8	Is the intention the obligations commence from the Effective from Date, in SMRS, or the date of the action in SMRS?	This has been changed to 16WD after physical energisation.
Western Power Distribution	5.2.2.7A	Suggest there ought to be a new row/item which says "If LDSO owns the Measurement Transformers go to 5.2.2.8 else go to 5.2.2.16". At present the "go to" is an action on the HHMOA and yet resides in a row/item (5.2.2.8) which is supposed to be an LSDO internal process.	Noted. Thank you for your suggestion. This has been considered in version 2.
Western Power Distribution	5.2.2.8	If aforementioned suggestion is agreed then the second sentence "If LDSO does not own…" can be deleted. If not accepted then this row/item appears to suggest that you could wait until 16WD after energisation before	Noted. Thank you for your suggestion. This has been considered in version 2.

Respondent	Location	Comment	
		moving on to step 5.2.2.16.	
Western Power Distribution	5.2.2.10 to 5.2..2.15 inc	The BSCP rows/items appear to be laid out in chronological order, however, items 5.2.2.10 to 5.2.2.15 are substantially out of position. On this basis, would it not be better if 5.2.2.10 to 5.2.2.15 inclusive were moved such that they followed on from 5.2.2.23? This would also address the point made in Q2 above, namely that the BSCP should be amended so that commissioning of the meter and measurement transformers is carried out in parallel, with the former having to be completed by energisation.	Noted. Thank you for your suggestion. This has been considered in version 2.
Western Power Distribution	5.2.2.10	This row/item says that the HHMOA should wait until 21 WD after energisation before proceeding with the commissioning of the meter. This cannot be correct. Suggest this item/row is deleted as it is not adding any value.	16 WD before energisation, is Commisssioning, the 21 WD is the receipt of the records from the DNO.
Western Power Distribution	5.2.2.11	Appear to be using 'Commissioning information' and 'records' interchangeably, which could cause confusion. Suggest "…escalate to the Supplier non-receipt of records" is changed to "…escalate the non-receipt to the Supplier".	Noted. Thank you for your suggestion. This has been considered in version 2.
Western Power Distribution	5.2.2.13	"Within 5 WD of 5.2.2.12" should be changed to "Within 10 WD of 5.2.2.12" (see comment in Q1 above).	Noted. Thank you for your suggestion. This has been considered in version 2.
Western Power Distribution	5.2.2.14	As currently worded the HHMOA is instructed to commission the meters 32 WD after energisation status is active in SMRS. This cannot be correct. Suggest this	Noted. Thank you for your suggestion. This has been considered in version 2.

Respondent	Location	Comment	
		item/row is deleted as it is not adding any value.	
Western Power Distribution	5.2.2.15	Appear to be using 'Commissioning information' and 'records' interchangeably, which could cause confusion. Suggest "…escalate again to the Supplier non-receipt of records" is changed to "…escalate again the non-receipt to the Supplier". "go to 5.2.2.10 for further Supplier escalation". Suggest this is deleted as it is not adding any value.	Noted. Thank you for your suggestion. This has been considered in version 2.
Western Power Distribution	5.2.2.16	"On the date requested or agreed in 5.2.2.5…" should be changed to "At the earliest opportunity…" so that the requirements are commensurate with the LDSO obligations.	Noted. Thank you for your suggestion. This has been considered in version 2.
Western Power Distribution	5.2.2.17	"but no later than 16WD after energisation status is active in SMRS" allows a customer's consumption to be unmetered for up to 16 working days. This cannot be correct. Suggest these words are deleted.	Your suggestion removed a deadline for commissioning which is one of the aims of this CP. The timescales have been changed to no later than 16 WD after physical energisation – they should not be waiting until then to perform Commissioning it should be done as soon as they are able to. The most frequent excuse for not Commissioning the equipment when its been fitted is that there is no load/not energised. This timescale now gives 16WD to perform the Commissioning. Its been added to ensure that Parties perform Commissioning whereas at the moment they are not.

Respondent	Location	Comment	
Western Power Distribution	5.2.2.18 & 5.2.2.19	There is an inference that HHMOA should not install the meter or energise the installation if he has not received Commissioning information from the LDSO. Note 17 states that the escalation process for this event is to the Operational Support Manager and then the PAB. The overall intent requires clarifying.	Noted. Thank you for your suggestion. This has been considered in version 2.
Western Power Distribution	6.2.2.A	Equivalent changes are required to this section as per the preceding comments.	This section will be removed.

BSCP515

Respondent	Location	Comment	
Association of Meter Operators	3.3.A.3 Note 3	"(and only for MSIDs first registered after 6 November 2008)" – the opportunity should be taken to remove this constraint. In 2013 The AMO facilitated with its members provision of details of all measurement transformer information to Distributors. Distributors therefore have visibility of this information. All D0268s provide visibility of the information, and always have.	Noted. Thank you for your suggestion. This has been considered in version 2.
Association of Meter Operators	3.3.A	The section has been introduced stated as for 'NEW' metering systems. There are not changes proposed for changes to existing metering systems where changes are made to the measurement transformers and therefore commissioning is required.	Noted. Thank you for your suggestion. This has been considered in version 2.
Association of Meter Operators	3.3.A.5	The distributor may commission the measurement transformers in advance of the registration and/or	Correct. It should be doing that anyway.

Respondent	Location	Comment	
		energisation request within SMRS	
Association of Meter Operators	3.3.A.7 & 8	The MO has no visibility of the energisation status within SMRS, so this cannot be used as a trigger by the MO	T Noted. Thank you for your suggestion. This has been considered in version 2.
Association of Meter Operators	3.3.A.7, 8, 11 & 12	As the Distributor is not involved in these steps they should not be included in BSCP515	Noted. Thank you for your suggestion. This has been considered in version 2.
Association of Meter Operators	3.3.A.7 & 8	There is no time for the MOA to consider and process information arriving from the Distributor before they are expected to notify the supplier. As these interactions are manual and require human review, there should be a delay of at least 5WD for the MOA to review and update records received from Distributor	Noted. Thank you for your suggestion. This has been considered in version 2.
Association of Meter Operators	3.3.A.9	This should probably be triggered from 3.3.A.8 rather than 7 as proposed	Noted. Thank you for your suggestion. This has been considered in version 2.
Association of Meter Operators	3.3.A.4	The footnote 12 would be better included in the 'when' box to make it clearer to all readers. This would be an improvement not only here, but in all other places where the similar footnote applies in BSCP515 & 514	Noted. Thank you for your suggestion. This has been considered in version 2.
Association of Meter Operators	3.3.A.4	The footnote only requires the D0215 to be sent to the MOA, why is it not also sent to Supplier? The DTC has an instance of the D0215 to the Supplier as well as the MO	There has not been any changes made to the file flows. I have separated Commissioning out of the flow timescales for clarity.
Association of Meter Operators	3.3.A.7 & 8	From the summer of 2015 Npower and the AMO have proposed changes to the D0215 to include commissioning information (commissioned Y/N & date of distributor commissioning). This was discussed at	The proposed changed to the D0215 that are referenced here are not related to these timescales. Separate flows will be created for P283.

Respondent	Location	Comment	
		IREG in Dec 2015, TAMEG in Jan 2016, and MDB in Mar 2016. Elexon have been aware of all these discussions. If the proposed modifications to the D0215 were progressed then this timescale could be shortened.	
Association of Meter Operators	3.3.A.5	One the reasons P283 placed a clear obligation on the Distributor to commission the measurement transformers, small wiring up to the Test Terminal Block was because they were best placed to perform this work when installing and commissioning the equipment. Commissioning of the measurement transformers (and associated cabling) will often be done before formal energisation of a new installation.	Noted. Thank you for your suggestion. This has been considered in version 2.
Association of Meter Operators	3.3.A.5	This CP proposes no changes for the existing installations where a measurement transformers (and associated wiring), although these changes will typically be done during a shutdown and will require commissioning immediately prior to placing back into service. The timescales should therefore be considerably less. MOCOPA® para 6.3.1 requires the Distributor to provide 15WD advance notice of planned work, and for unplanned work to advise as soon as possible either prior to or after work is carried out.	Noted. Thank you for your suggestion. This has been considered in version 2.
Association of Meter Operators	3.3.A.10	This makes no recognition of other scenarios where information may not be available or where commissioning may not have occurred at this point.	This is where the MOA is expected to engage with the Supplier regarding these situations.
Association of Meter	3.3.6.A	The information required column is blank. After	Noted. Thank you for your suggestion. This has been

Respondent	Location	Comment	
Operators		discussion about the guidance note in Jan 2016 with meter operators they were of the view that there was no information required, other than that already in the D0215 and confirmation of the date that the MPAN has been commissioned. As commented elsewhere, CoP4 is not clear about the Commissioning requirements. This proposal is therefore not explicit about the information required.	considered in version 2.
Association of Meter Operators	3.3.A.13	Making this strep conditional on completion of all the commissioning means that provision of MTD to the LDSO, and other parties, notably the DC will mean that no data will enter settlement for this metering system, except estimates based on an EAC and a default profile. Despite all the concerns about Commissioning this change will result in actual data not being provided for many metering systems until well after the SF run. This cannot be a sensible approach.	Noted. Thank you for your suggestion. This has been considered in version 2.
Northern Powergrid	3.3.A title	This should read New SVA metering system (for HH metering systems with measurement transformers) – as P283 only applies to HH CT metering.	This is being corrected.
UK Power Networks Operations Ltd	BSCP515 3.3.A.5	Is the intention the obligations commence from the Effective from Date, in SMRS, or the date of the action in SMRS?	This has been changed to 16WD after physical energisation which should be reflected as the same date in SMRS/ECOES.
Western Power Distribution	Note 10 associated with 3.3.A.3	"… step 3.3.3" should say "… step 3.3.A.3"	Noted. Thank you for your suggestion. This has been considered in version 2.
Western Power	3.3.A	Equivalent changes are required to this section as per	Noted. Thank you for your suggestion. This has been

Respondent	Location	Comment	
Distribution		the comments in BSCP514 above.	considered in version 2.