

CP Consultation Responses



CP1466 'Removing SMETS compliant Meters from the scope of BSCP601'

This CP Consultation was issued on 12 September 2016 as part of CPC00770, with responses invited by 7 October 2016.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
British Gas	1 / 0	Supplier
E.ON Energy Solutions	1 / 0	Supplier
IMServ Europe	0 / 1	Supplier Agent
Npower Group	8 / 0	Generator / Supplier / Non Physical Trader / Supplier Agent
ScottishPower	0 / 1	Supplier Agent
STARK	0 / 1	Supplier Agent
TMA Data Management Ltd	0 / 1	Supplier Agent
Western Power Distribution	4 / 0	Distributor

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
British Gas	✓	✗	✗	✓
E.ON Energy Solutions	✓	✗	✗	✓
IMServ Europe	✓	✓	✓	✓
Npower Group	✗	✓	✓	✗
ScottishPower	✓	✗	✗	✓
STARK	✓	✓	✓	✓
TMA Data Management Ltd	✓	✓	✓	✓
Western Power Distribution	✓	✗	✗	✓

Question 1: Do you agree with the CP1466 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
7	1	0	0

Responses

Respondent	Response	Rationale
British Gas	Yes	-
E.ON Energy Solutions	Yes	-
IMServ Europe	Yes	-
Npower Group	No	<p>npower agrees that DCC enrolled meters (SMETS2) should be removed from the scope of BSCP 601. As stated by the proposer, SMETS meters do not need to be COP compliant as they are already SMETS compliant. We therefore have no issues with removing SMETS 1 and 2 from the COP Compliance section of BSCP 601.</p> <p>However, npower does not agree that SMETS1 meter should be taken out of scope for protocol approval. The rationale given in the change proposal for removing SMETS meters from the scope of BSCP601 is that they will be communicated with via the DCC; a common communication method. This is true for SMETS2 and we support the removal of the obligation to go through protocol approval for SMETS 2 meters. The rationale given however does not support removing protocol approval for SMETS1. Whilst we accept that SMETS1 meters will eventually be serviced by the DCC, we do not believe this is imminent. Whilst these meters are being serviced by separate data-retrieval systems they should be left in scope for protocol approval. Protocol approval is not concerned with ensuring meter compliance, its purpose is to ensure the data-retrieval system functions correctly and does not corrupt the integrity of the meter or the data downloaded from the meter. Removing SMETS1 from the scope of protocol approval will introduce a risk that data-retrievers do not have to ensure the integrity of the systems they are using to remotely connect to SMETS meters.</p>

Respondent	Response	Rationale
		<p>We instead suggest that the proposal should completely remove SMETS2 meters from the scope of BSCP601. It should also remove SMETS meters from the COP Compliance section of BSCP601. However data retrievers should still be subject to go through protocol approval for any system they use to remotely connect to meters not through the DCC – whether SMETS or not. A further change could be raised later down the line at a time when SMETS1 meter are more integrated into the DCC.</p>
ScottishPower	Yes	Agree with the proposed solution as removing SMETS compliant Meters from the scope of BSCP601 is a sensible approach that will remove unnecessary duplication of compliance testing.
STARK	Yes	Solution seems to support the proposer's justification.
TMA Data Management Ltd	Yes	We support the exemption of SMETS compliant meter for BSCP601 testing to remove duplication of compliance testing.
Western Power Distribution	Yes	-

Question 2: Do you agree that the draft redlining delivers the CP1466 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
8	0	0	0

Responses

Respondent	Response	Rationale
British Gas	Yes	-
E.ON Energy Solutions	Yes	-
IMServ Europe	Yes	-
Npower Group	Yes	Yes, the redlining delivers the solution proposed. However for the reasons stated above, npower does not support the current proposal in its entirety.
ScottishPower	Yes	The draft redlining is reflective of the proposed solution and meets the requirements.
STARK	Yes	-
TMA Data Management Ltd	Yes	-
Western Power Distribution	Yes	-

Question 3: Will CP1466 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
4	4	0	0

Responses

Respondent	Response	Rationale
British Gas	No	-
E.ON Energy Solutions	No	-
IMServ Europe	Yes	As a HHDC and MOA, we will need to review incoming Meter Technical Details in order to establish whether the Metering Equipment is compliant with SMETS and recognise, where such Metering Equipment is of a new type and is SMETS compliant, no Compliance or Protocol Approval Testing will be required.
Npower Group	Yes	Yes, as a Half Hourly Data Collector (HHDC) npower will need to make some system and/or process changes to be able to identify and communicate to a supplier regarding whether a meter is SMETS compliant. However, these changes are not large enough to not support the change being proposed here.
ScottishPower	No	This proposed change will have no impact on our organisation.
STARK	Yes	As HHDC, should the notified meter not be compliant with SMETS, it has been indicated that this meter will require protocol testing; we would however expect this to be marginal as surely the issue of non-compliance should be resolved before potentially being installed and the responsibility of the Supplier.
TMA Data Management Ltd	Yes	There is a small procedural impact.
Western Power Distribution	No	-

Question 4: Will your organisation incur any costs in implementing CP1466?

Summary

Yes	No	Neutral/No Comment	Other
4	4	0	0

Responses

Respondent	Response	Rationale
British Gas	No	-
E.ON Energy Solutions	No	-
IMServ Europe	Yes	Any costs incurred are likely to be minimal both in terms of one off and ongoing costs.
Npower Group	Yes	Yes, there will be a small cost incurred in implementing the system and/or process changes mentioned above.
ScottishPower	No	It is not anticipated that this proposed change will bring any cost to our organisation.
STARK	Yes	Marginal, man hours if protocol testing is required but should not expect this to occur frequently.
TMA Data Management Ltd	Yes	There will be minor costs to modify our procedure and there will also be savings on BSCP601 costs.
Western Power Distribution	No	-

Question 5: Do you agree with the proposed implementation approach for CP1466?

Summary

Yes	No	Neutral/No Comment	Other
7	1	0	0

Responses

Respondent	Response	Rationale
British Gas	Yes	-
E.ON Energy Solutions	Yes	This seems a pragmatic approach.
IMServ Europe	Yes	-
Npower Group	No	No, for the reasons already given npower does not support the proposal to remove SMETS1 meters from the protocol approval section of BSCP601. Protocol approval ensures that the system works correctly, not just the meter. As stated above, we would suggest a two tier approach where the SMETS2 meters are removed from the BSCP entirely and SMETS1 meters are removed from COP compliance testing initially. SMETS1 meters should then be removed from protocol approval at a later date when there is a clearer view of when the DCC will have adopted the majority of SMETS1 meters.
ScottishPower	Yes	Agree that the implementation approach and proposed date of February 2017 is reasonable.
STARK	Yes	Is in line to meet the expectations of Ofgem on the progression of changes relating to elective HH Settlement, should other changes progress.
TMA Data Management Ltd	Yes	We agree with an implementation date of 23/02/2017.
Western Power Distribution	Yes	-

Question 6: Do you have any further comments on CP1466?

Summary

Yes	No
1	7

Responses

Respondent	Response	Comments																																												
British Gas	No	-																																												
E.ON Energy Solutions	No	-																																												
IMServ Europe	Yes	<p>How will HH Agents ascertain if a given Metering Equipment type is SMETS compliant, is a central register to be kept?</p> <p>I believe that for NHH sites the Meter Type field (J0483) in the D0150 is used to indicate if the meter is SMETS approved thus:</p> <table border="1"> <thead> <tr> <th>TYPE</th> <th>VALUE</th> <th>FILTER</th> <th>DESCRIPTION</th> </tr> </thead> <tbody> <tr> <td>SMETSMeterType</td> <td>S1</td> <td>All</td> <td>S1</td> </tr> <tr> <td>SMETSMeterType</td> <td>S2A</td> <td>All</td> <td>S2A</td> </tr> <tr> <td>SMETSMeterType</td> <td>S2AD</td> <td>All</td> <td>S2AD</td> </tr> <tr> <td>SMETSMeterType</td> <td>S2ADE</td> <td>All</td> <td>S2ADE</td> </tr> <tr> <td>SMETSMeterType</td> <td>S2B</td> <td>All</td> <td>S2B</td> </tr> <tr> <td>SMETSMeterType</td> <td>S2BD</td> <td>All</td> <td>S2BD</td> </tr> <tr> <td>SMETSMeterType</td> <td>S2BDE</td> <td>All</td> <td>S2BDE</td> </tr> <tr> <td>SMETSMeterType</td> <td>S2C</td> <td>All</td> <td>S2C</td> </tr> <tr> <td>SMETSMeterType</td> <td>S2CD</td> <td>All</td> <td>S2CD</td> </tr> <tr> <td>SMETSMeterType</td> <td>S2CDE</td> <td>All</td> <td>S2CDE</td> </tr> </tbody> </table> <p>(The above list of values being contained in Market Domain Data).</p> <p>Will there be something equivalent in the HH world, is something similar going to be implemented in the Outstation Type field (J0471) i.e. should one of the</p>	TYPE	VALUE	FILTER	DESCRIPTION	SMETSMeterType	S1	All	S1	SMETSMeterType	S2A	All	S2A	SMETSMeterType	S2AD	All	S2AD	SMETSMeterType	S2ADE	All	S2ADE	SMETSMeterType	S2B	All	S2B	SMETSMeterType	S2BD	All	S2BD	SMETSMeterType	S2BDE	All	S2BDE	SMETSMeterType	S2C	All	S2C	SMETSMeterType	S2CD	All	S2CD	SMETSMeterType	S2CDE	All	S2CDE
TYPE	VALUE	FILTER	DESCRIPTION																																											
SMETSMeterType	S1	All	S1																																											
SMETSMeterType	S2A	All	S2A																																											
SMETSMeterType	S2AD	All	S2AD																																											
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SMETSMeterType	S2BD	All	S2BD																																											
SMETSMeterType	S2BDE	All	S2BDE																																											
SMETSMeterType	S2C	All	S2C																																											
SMETSMeterType	S2CD	All	S2CD																																											
SMETSMeterType	S2CDE	All	S2CDE																																											

Respondent	Response	Comments
		above values appear in this field appear within a D0268 sent to the HHDC, the HHDC would then know this was a SMETS approved meter?
Npower Group	No	-
ScottishPower	No	-
STARK	No	-
TMA Data Management Ltd	No	-
Western Power Distribution	No	-