

# CP Consultation Responses

## CP1477 'Updates to BSCP537 Appendix 1 as a result of P283'



This CP Consultation was issued on 9 January 2017 as part of CPC00773, with responses invited by 3 February 2017.

### Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
OneSelect Limited	1/0	Supplier
Western Power Distribution	4/0	Distributor
ScottishPower	0/1	HHMOA
Npower	0/1	Supplier Agent
GTC	1/0	Distributor
SSE Energy Supply Limited	1/1	Supplier and Supplier Agent (HHMOA)
EPG Energy Ltd (EnDCo)	1/0	Supplier

## Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
OneSelect Limited	✓	✗	✗	-
Western Power Distribution	✓	✓	✗	✓
ScottishPower	✓	✗	✗	✓
Npower	✓	✓	✗	✓
GTC	✓	✗	✗	✓
SSE Energy Supply Limited	✓	✗	✗	✓
EPG Energy Ltd (EnDCo)	✓	✓	✗	✓

## Question 1: Do you agree with the CP1477 proposed solution?

### Summary

Yes	No	Neutral/No Comment	Other
7			

### Responses

Respondent	Response	Rationale
OneSelect Limited	Yes	As a start-up Supplier we don't have any objections for this shift of responsibility. Starting in April OneSelect will start its activities on Domestic market. No HH will be involved from start.
Western Power Distribution	Yes	We agree with the Proposer's rationale that BSCP537 Appendix 1 should be updated to reflect the new obligations placed on SVA MOA's, CVA MOA's and Suppliers as a result of the implementation of Modification P283.
ScottishPower	Yes	Yes, agree with the proposed solution
Npower	Yes	Yes. P283 has changed the obligations for suppliers and MOAs and it is sensible that the process of qualification is changed accordingly. I also agree that this CP does not force MOAs and suppliers to re-qualify as this would be counter-productive and unnecessary considering the work currently being undertaken through TAPAP checks.
GTC	Yes	Yes
SSE Energy Supply Limited	Yes	
EPG Energy Ltd (EnDCo)	Yes	Anything that helps enforce the commissioning process is a good thing.

## Question 2: Do you agree that the draft redlining delivers the CP1477 proposed solution?

### Summary

Yes	No	Neutral/No Comment	Other
5	2		

### Responses

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

Respondent	Response	Rationale
OneSelect Limited	Yes	
Western Power Distribution	Yes	
ScottishPower	No	The draft redlining contains an error in section 15.1.6 (6) This section relates to CVAMOA but there is a reference to 'SVA HHMOA' this should be amended to 'CVA HHMOA' to align with the subject of this section.
Npower	Yes (General Agreement)	I agree generally although please see some comments below.
GTC	Yes	
SSE Energy Supply Limited	No	Please see comments on redlining.
EPG Energy Ltd (EnDCo)	Yes	

## Question 3: Will CP1477 impact your organisation?

### Summary

Yes	No	Neutral/No Comment	Other
3	4		

### Responses

Respondent	Response	Rationale
OneSelect Limited	No	
Western Power Distribution	Yes	Minor changes to documentation if our MOA needs to seek requalification.
ScottishPower	No	No impact from CP1477
Npower	Yes	Although this CP will not immediately affect us a HHMOA or CVAMOA, if in the future we need to requalify in any of these roles then we will have to take note of this CP and answer the questions in the SAD accordingly. As such this will require changes in our qualification/re-qualification procedures (although these are minimal.)
GTC	No	
SSE Energy Supply Limited	No	We would not be impacted unless we needed to requalify.
EPG Energy Ltd (EnDCo)	Yes	Will enable us as a supplier to pressure unco-operative Mops when meters are not configured. Not actual process changes required

## Question 4: Will your organisation incur any costs in implementing CP1477?

### Summary

Yes	No	Neutral/No Comment	Other
	7		

### Responses

Respondent	Response	Rationale
OneSelect Limited	No	
Western Power Distribution	No	We will not incur any cost as a result of this change.
ScottishPower	No	No cost will be incurred.
Npower	No	No
GTC	No	
SSE Energy Supply Limited	No	
EPG Energy Ltd (EnDCo)	No	

## Question 5: Do you agree with the proposed implementation approach for CP1477?

### Summary

Yes	No	Neutral/No Comment	Other
6		1	

### Responses

Respondent	Response	Rationale
OneSelect Limited	Neutral	We don't have any practical experience in the old situation.
Western Power Distribution	Yes	The implementation approach appears reasonable.
ScottishPower	Yes	Agree with the proposed implementation date for CP1477.
Npower	Yes	Yes – with a few comments made on the redlining below.
GTC	Yes	No further comments
SSE Energy Supply Limited	Yes	
EPG Energy Ltd (EnDCo)	Yes	

## Question 6: Do you have any further comments on CP1477?

### Summary

Yes	No
	7

### Responses

Respondent	Response	Comments
OneSelect Limited	No	
Western Power Distribution	No	No further comments
ScottishPower	No	No further Comments
Npower	No	No.
GTC	No	
SSE Energy Supply Limited	No	
EPG Energy Ltd (EnDCo)	No	



**BSCP537 Appendix 1**

Respondent	Location	Comment
ScottishPower	15.6.1 (6)	The draft redlining contains an error in section 15.1.6 (6) This section relates to CVAMOA but there is a reference to 'SVA HHMOA' this should be amended to 'CVA HHMOA' to align with the subject of this section.
Npower	Page 2 13.1.8	I'm not sure of the relevance of adding "for all types of Meters (including whole current metering)?"  COP4 already defines the commissioning requirements for all types of metering so the phrase "meet the requirements detailed in COP4" already covers this. Furthermore, this is misleading as it suggests that P283 specific obligations within the evidence response section apply to w/c metering. This is not the case as the P283 process only applies to CT metering.
Npower	Page 4 14.1.8	I'm not sure of the relevance of adding "for all types of Meters (including whole current metering)?"  COP4 already defines the commissioning requirements for all types of metering so the phrase "meet the requirements detailed in COP4" already covers this. Furthermore, this is misleading as it suggests that P283 specific obligations within the evidence response section apply to w/c metering. This is not the case as the P283 process only applies to CT metering.
SSE Energy Supply Limited	13.1.8.	Unclear on the value of adding "for all types of Meters (including whole current metering)" on the basis that CoP4 does not place any commissioning requirements on whole current meters (specifically), only calibration testing parameters. Suggest 13.1.8. would read more clearly if it remains as, "What controls do you have in place to ensure that all commissioning tests are conducted to meet the requirements detailed in CoP 4"
SSE Energy Supply Limited	13.1.8 (5 - i)	Is it not for the responsible party to provide results from stage 1 commissioning as opposed to the MOA requesting, e.g. BSCP514 5.2.2.A.2 'LDSO contacts HHMOA to 'Send complete Commissioning information for the Measurement Transformers to the HHMOA'
SSE Energy Supply	13.1.8 (6)	We could not identify what BSC obligation this

Respondent	Location	Comment
Limited		refers to.