

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



Contents

1	Why Change?	2
2	Solution	3
3	Impacts and Costs	4
4	Implementation Approach	5
5	Initial Committee Views	6
6	Industry Views	7
7	Final Committee Views and Decision	10
	Appendix 1: Glossary & References	12

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About This Document

This document is the Change Proposal (CP)1477 Final CP Report which ELEXON has published following the final decision from the Performance Assurance Board (PAB), Imbalance Settlement Group (ISG) and Supplier Volume Allocation Group (SVG) to approve CP1477.

There are three parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, and proposed implementation approach. It also summarises the PAB's, ISG's and SVG's views on the proposed changes and the views of respondents to the CP Consultation, along with the final decision to approve this change.
- Attachment A contains the approved redlined changes to deliver the CP1477 solution.
- Attachment B contains the full responses received to the CP Consultation.

1 Why Change?

Background

Modification P283

ELEXON implemented Modification [P283 'Reinforcing the Commissioning of Metering Equipment Processes'](#) on 6 November 2014. The Modification placed Commissioning obligations on the Metering Equipment owner, subject to the Metering Equipment owner being a Balancing and Settlement Code (BSC) Party. This shifted the responsibility for the Commissioning of measurement transformers from the Meter Operator Agent (MOA) to the Licenced Distribution System Operator (LDSO) (or Transmission Company where applicable). It also placed an obligation on the MOA to inform the Registrant of the Commissioning status of each Metering System.

Under P283, MOAs retained responsibility for assessing the overall accuracy of the Metering System. Introducing an obligation for the MOA to communicate the Commissioning status of a Metering System to the Registrant (typically the Supplier) was intended to ensure that the Supplier had a complete picture of the status of its Half Hourly (HH) portfolio. The Supplier could then take corrective action over any gaps in the Commissioning process.

Qualification process

As part of the Qualification process, participants applying to Qualify as a Supplier Volume Allocation (SVA) Party, SVA Party Agent or Central Volume Allocation (CVA) MOA must complete [BSCP537 'Appendix 1 Self Assessment Document \(SAD\)'](#). BSCP537 Appendix 1 is a long Microsoft Word format questionnaire, where applicants provide responses and supporting evidence to questions. BSCP537 Appendix 1 provides assurance that the applicant has the necessary systems, processes and knowledge in place to perform in their intended role.

What is the issue?

BSCP537 Appendix 1 has not been updated since the implementation of P283. Therefore, BSCP537 Appendix 1 does not reflect the new Commissioning obligations P283 introduced. ELEXON took an action from the PAB in December 2015 ([PAB179](#)) to investigate whether it believes changes should be made to BSCP537 Appendix 1 in light of P283.

Approved solution

ELEXON raised [CP1477 'Updates to BSCP537 Appendix 1 as a result of P283'](#) on 7 November 2016.

CP1477 proposes to update the questions around the Commissioning process in the role-specific sections in BSCP537 Appendix 1. If approved CP1477 will update the following sections:

- Question 13.1.8 in Section 13 'SVA HHMOA';
- Question 15.1.6 in Section 15 'CVA MOA'; and
- Question 18.1.5 in Section 18 'Supplier'.

Specifically, this CP will update the guidance within BSCP537 Appendix 1 on answering these questions, which are specific to the Commissioning process. The updated guidance will reflect the new obligations introduced by P283, such as the MOA informing the Registrant of the Commissioning status and the Supplier making corrective actions over any gaps in the Commissioning process. Please refer to Attachment A for these proposed changes to BSCP537 Appendix 1.

This CP also includes minor housekeeping changes to Question 14.1.8 in Section 14 'SVA NHHMOA'. In particular, these changes improve the use of language and correct redundant references. Therefore, our proposed changes to Question 14.1.8 introduce no new obligations for qualifying SVA NHHMOAs. Please refer to Attachment A for these proposed changes to BSCP537 Appendix 1.

Proposer's rationale

If approved, CP1477 will ensure that BSCP537 Appendix 1 reflects the requirements of P283, as requested by the PAB. These changes will clarify what is expected of qualifying SVA HHMOAs, CVA MOAs and Suppliers when providing evidence that their systems, processes and knowledge meet their P283 Commissioning obligations. This will improve the quality of initial submissions, which in turn will improve the efficiency of the Qualification process. These changes will also provide assurance that the applicant will meet their Commissioning obligations when acting as a qualified participant.

Approved redlining

Attachment A contains the approved changes to BSCP537 Appendix 1 to deliver CP1477.

3 Impacts and Costs

Central impacts and costs

CP1477 will require a change to BSCP537 Appendix 1. No Central System changes are required. There will be a small impact on the Qualification Service Provider (QSP). This is because it will have to send a new version of BSCP537 Appendix 1 to qualifying and re-qualifying participants. ELEXON consulted the QSP on this change, and the QSP supports the progression of this change.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none">BSCP537 Appendix 1	<i>None</i>

The Central implementation costs for CP1477 will be approximately £240 (one ELEXON working day) to implement the document changes.

BSC Party & Party Agent impacts and costs

CP1477 will impact qualifying Suppliers, CVA MOAs and SVA HHMOAs. It will be clearer to applicants qualifying in these roles what evidence they must provide when answering questions in BSCP537 Appendix 1 around the Commissioning process.

CP1477 will have no impact on Qualified participants, unless they are subject to re-Qualification. Suppliers are not subject to re-Qualification. Therefore, in terms of impacts on Qualified participants, only SVA HHMOAs and CVA MOAs can potentially be affected by CP1477 (if subject to re-Qualification¹).

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
Supplier	More detailed answers and evidence required in BSCP537 Appendix 1 around the Commissioning process. Applicable to Suppliers undergoing Qualification only.
CVA MOA	More detailed answers and evidence required in BSCP537 Appendix 1 around the Commissioning process. Applicable to CVA MOAs undergoing Qualification or re-Qualification.
SVA HHMOA	More detailed answers and evidence required in BSCP537 Appendix 1 around the Commissioning process. Applicable to SVA HHMOAs undergoing Qualification or re-Qualification.

¹ CP1477 does not place any obligation for Qualified participants to re-Qualify around their Commissioning obligations. Re-Qualification is subject to Section 2.2 'Re-Qualification Process' in [BSCP537 'Qualification Process for SVA Parties, SVA Party Agents and CVA MOAs'](#).

4 Implementation Approach

Approved Implementation Date

CP1477 will be implemented on **29 June 2017** as part of the June 2017 BSC Release.

We have proposed this Implementation Date as it is the next practical BSC Release that can include CP1477. This Implementation Date also aligns with changes to BSCP537 Appendix 1 as part of [CP1474 'Updating the CoMC processes to facilitate the elective HH Settlement of SMETS Meters'](#). This enables ELEXON to make a single set of changes to BSCP537 as part of the June Release and means the QSP can issue one new version of BSCP537 Appendix 1 to qualifying and re-qualifying participants following the June 2017 BSC Release.

5 Initial Committee Views

PAB's initial views

The PAB considered CP1477 at its meeting on 24 November 2016 ([PAB190/06](#)).

The PAB did not make any comments.

SVG's initial views

The SVG considered CP1477 at its meeting on 6 December 2016 ([SVG190/05](#)).

The SVG did not make any comments.

ISG's initial views

The ISG considered CP1477 at its meeting on 13 December 2016 ([ISG188/07](#)).

An ISG Member questioned if DNO would be impacted by this CP. ELEXON confirmed that currently there is not a DNO specific section within BSCP537 Appendix 1. DNOs are qualified as Supplier Meter Registration Agent (SMRA) in Section 12 and Unmetered System Operator (UMSO) in Section 17. ELEXON discussed internally whether one should be introduced for this CP, but felt that would be a disproportionate approach as it would require adding an entire new Section for a sole question.

An ISG Member asked how the MOA would inform the Registrant when Commissioning was complete. ELEXON noted that the current process was email based, thus upon completion of Commissioning in accordance with Code of Practice (CoP) 4², the MOA would inform the Registrant. The MOA also informs the Registrant via email if Commissioning could not be completed in accordance with CoP4.

An ISG Member asked how this change would be communicated to relevant Parties, and if this change is only relevant to new Party Agents. ELEXON noted that KPMG has informed impacted parties in the Qualification process, and those looking to qualify, of the upcoming changes in June 2017. ELEXON clarified that this change is not looking to introduce any obligations to re-qualify participants. An ISG Member questioned if this is the correct approach, and if re-Qualification should be considered. ELEXON noted that there had been a recent round of Technical Assurance of Performance Assurance Parties (TAPAP) checks for P283 on Suppliers, MOAs and DNOs, and that a number of parties were in the Error and Failure Resolution (EFR)³ process as a result. ELEXON also noted that Commissioning is included in the scope of the 2016/17 BSC Audit.

² [Code of Practice 4: The Calibration, Testing and Commissioning Requirements of Metering Equipment for Settlement Purposes.](#)

³ The TAPAP process is designed to identify if a party is non-compliant, while the EFR process is designed to ensure parties resolve non-compliances.

6 Industry Views

This section summarises the responses received to the CP Consultation. You can find the full responses in Attachment B.

Summary of CP1477 CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1477 proposed solution?	7			
Do you agree that the draft redlining delivers the intent of CP1477?	5	2		
Will CP1477 impact your organisation?	3	4		
Will your organisation incur any costs in implementing CP1477?		7		
Do you agree with the proposed implementation approach for CP1477?	6		1	
Do you have any further comments on CP1477?		7		

We received seven responses to the CP Consultation. All the respondents agreed with the proposed solution which reflects the obligations placed on SVA MOA's, CVA MOA's and Suppliers as a result of the implementation of Modification P283.

Three respondents will be impacted by CP1477 but the changes to their documentation will be minor.

Comments on the proposed redlining

Comments on the CP1477 Proposed Redlining		
Document & Location	Comment	ELEXON's Response
15.1.6 (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.	Although ELEXON agreed with the comment, the amendment should be to 'CVA MOA'. All CVA Metering Systems must be HH; therefore CVA MOAs are HH by default.
13.1.8	I'm not sure of the relevance of adding " <i>for all types of Meters (including whole current metering)?</i> " COP4 already defines the commissioning requirements for all types of metering so the phrase " <i>meet the requirements detailed in</i>	ELEXON noted that these sentences were added for clarity.

Comments on the CP1477 Proposed Redlining

Document & Location	Comment	ELEXON's Response
	<i>COP4</i> 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.	
14.1.8	I'm not sure of the relevance of adding " <i>for all types of Meters (including whole current metering)?</i> " COP4 already defines the commissioning requirements for all types of metering so the phrase " <i>meet the requirements detailed in COP4</i> " 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.	As above.
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"	As above.
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'	ELEXON noted that the LDSO is required to send information without the MOA requesting it but, when it has not received it, it is reasonable for the Registrant to ask for it. ELEXON acknowledged the suggestion and changed the reference from 'requested' to 'received'.
13.1.8 (6)	We could not identify what BSC	ELEXON confirmed the first part

Comments on the CP1477 Proposed Redlining

Document & Location	Comment	ELEXON's Response
	obligation this refers to.	refers to BSCP514 2.2.2 Termination of Appointment of Meter Operator Agent. The second part refers to CoP4 Section 1.

PAB's final views

The PAB considered CP1477 at its meeting on 24 February 2017 ([PAB193/06](#)).

The PAB did not make any comments.

The PAB:

- **AGREED** the amendments to the proposed redlining for BSCP537 for CP1477 made following the CP Consultation;
- **APPROVED** CP1477 for implementation on 29 June 2017 as part of the June 2017 Release; and
- **NOTED** that CP1477 will also be presented for decision to the ISG and SVG on 28 March 2017 and 4 April 2017 respectively.

ISG's final views

The ISG considered CP1477 at its meeting on 28 March 2017 ([ISG192/03](#)).

An ISG Member noted that in the CP Assessment Report it was mentioned 'The LDSO is required to send information without the MOA requesting it but, when it has not received it, it is reasonable for the MOA to ask for it.' The ISG noted that the MOA to MOA information should be passed between each of the MOAs. The LDSO is not necessarily required to send information, because the LDSO might not be the equipment owner, in which case the LDSO could not send any information, even if the MOA did request it. It should be the responsibility of the Registrant to ask for the information.

ELEXON updated the paper to reflect that the Registrant can request the information to the LDSO and amended the redlining at steps 13.1.8 (i) and 15.1.6 (i) from 'requested' to 'received'.

The ISG:

- **AGREED** the amendments to the proposed redlining for BSCP537 for CP1477 made following the CP Consultation;
- **APPROVED** CP1477 for implementation on 29 June 2017 as part of the June 2017 Release; and
- **NOTED** that CP1477 was presented for decision to the PAB on 24 February 2017 and it will be presented to the SVG on 4 April 2017.

SVG's final views

The SVG considered CP1477 at its meeting on 4 April 2017 ([SVG194/04](#)).

The SVG agreed with the ISG suggested amendment. ELEXON also clarified that this change was not material as it was the result of an error in the redlined text and it aligns with the Consultation responses, with the ISG view and with the scope of the CP.

The SVG:

- **AGREED** the amendments to the proposed redlining for BSCP537 for CP1477 made following the CP Consultation;
- **APPROVED** CP1477 for implementation on 29 June 2017 as part of the June 2017 Release; and
- **NOTED** that CP1477 was presented for decision to the PAB on 24 February 2017 and to the ISG on 28 March 2017.

Final decision

The PAB, the ISG and the SVG have:

- **APPROVED** CP1477 for implementation on 29 June 2017 as part of the June 2017 BSC Systems Release.

Appendix 1: Glossary & References

Acronyms

Acronyms used in this document are listed in the table below.

Acronyms	
Acronym	Definition
BSC	Balancing and Settlement Code (<i>Industry Code</i>)
BSCP	Balancing and Settlement Code Procedure (<i>Code Subsidiary Document</i>)
CP	Change Proposal
CPC	Change Proposal Circular
CVA	Central Volume Allocation
DNO	Distribution Network Operator
EFR	Error and Failure Resolution
HH	Half Hourly
HHMOA	Half Hourly Meter Operator Agent (<i>Supplier Agent role</i>)
ISG	Imbalance Settlement Group (<i>Industry Panel sub-Committee</i>)
LDSO	Licensed Distribution System Operator (<i>BSC Party role</i>)
MOA	Meter Operator Agent (<i>Supplier Agent role</i>)
NHHMOA	Non Half Hourly Meter Operator Agent (<i>Supplier Agent role</i>)
PAB	Performance Assurance Board (<i>Industry Panel sub-Committee</i>)
QSP	Qualification Service Provider (<i>BSC Agent</i>)
SAD	Self Assessment Document
SMRA	Supplier Meter Registration Agent
SVA	Supplier Volume Allocation
SVG	Supplier Volume Allocation Group (<i>Industry Panel sub-Committee</i>)
TAPAP	Technical Assurance of Performance Assurance Parties
Unmetered System Operator	Unmetered System Operator

External links

A summary of all hyperlinks used in this document are listed in the table below.

All external documents and URL links listed are correct as of the date of this document.

External Links		
Page(s)	Description	URL
2	P283 page on the ELEXON website	https://www.elexon.co.uk/mod-proposal/p283/

CP1477
Final CP Report

19 April 2017

Version 1.0

Page 12 of 13

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External Links		
Page(s)	Description	URL
2, 4	BSCP page on the ELEXON website	https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/
2	PAB179 page on the ELEXON website	https://www.elexon.co.uk/meeting/pab-179/
3	CP1477 page on the ELEXON website	https://www.elexon.co.uk/change-proposal/cp1477/
6	CP1474 page on the ELEXON website	https://www.elexon.co.uk/change-proposal/cp1474/
7	PAB190 page on the ELEXON website	https://www.elexon.co.uk/meeting/pab-190/?from_url=https://www.elexon.co.uk/events-calendar-item/pab-190/
7	SVG190 page on the ELEXON website	https://www.elexon.co.uk/meeting/svg-190/?from_url=https://www.elexon.co.uk/events-calendar-item/svg-190/
7	ISG188 page on the ELEXON website	https://www.elexon.co.uk/meeting/isg-188/?from_url=https://www.elexon.co.uk/events-calendar-item/isg-188/
7	CoPs page on the ELEXON website	https://www.elexon.co.uk/bsc-related-documents/related-documents/codes-of-practice/
10	PAB193B page on the ELEXON website	https://www.elexon.co.uk/meeting/pab-193b/?from_url=https://www.elexon.co.uk/events-calendar-item/pab-193b/
10	ISG192 page on the ELEXON website	https://www.elexon.co.uk/meeting/isg-192/
10	SVG194 page on the ELEXON website	https://www.elexon.co.uk/meeting/svg-194/