

# CP Assessment Report

## CP1496 'Introduction of two data flows for the Commissioning process for Half Hourly (HH) Supplier Volume Allocation (SVA) Current Transformer (CT) operated Metering Systems'

**ELEXON**



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### Committee

Supplier Volume Allocation Group

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### Recommendation

Approve

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### Implementation Date

1 November 2018  
(November 2018 Release)



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### About This Document

This document is the Change Proposal (CP) Assessment Report for CP1496 which ELEXON will present to the Supplier Volume Allocation Group (SVG) at its meeting on 30 January 2018 and was presented to the Imbalance Settlement Group (ISG) at its meeting on 16 January 2018. The SVG will consider the proposed solution and the responses received to the CP Consultation before making a decision on whether to approve CP1496.

There are seven 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 ISG's and SVG's initial views on the proposed changes and the views of respondents to the CP Consultation.
- Attachments A-E contains the proposed redlined changes to deliver the CP1496 solution.
- Attachment F contains the full responses received to the CP Consultation.

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## Background

Whenever new Metering Systems are installed it is essential to ensure that the correct Commissioning process is followed. The requirements for Commissioning are set out in [Code of Practice Four 'Code of Practice for the Calibration, Testing and Commissioning requirements of Metering Equipment for Settlement purposes' \(CoP4\)](#). By ensuring the Commissioning process is completed correctly, Parties can be assured that the data submitted for Settlement purposes is accurate. This reduces the probability of Trading Disputes arising from the use of inaccurate data.

The responsibility for Commissioning of the overall Metering System lies with the Registrant<sup>1</sup>. However, responsibility for the Commissioning of specific items of Metering Equipment lies with either their appointed Half Hourly Meter Operator Agent (HHMOA) or the Licenced Distribution System Operator (LDSO) dependent on the type of Metering Equipment and ownership of the Metering Equipment. Where a measurement transformer<sup>2</sup> is owned by a Balancing and Settlement Code (BSC) Party, the owning BSC Party shall be responsible for its Commissioning up to, and including, the testing facilities (in this case the MOA remains responsible for Commissioning the remainder of the Metering System). Where a measurement transformer is not owned by a BSC Party, the Registrant, via its appointed HHMOA, shall be responsible for the Commissioning of all Metering Equipment within the Metering System, including the measurement transformer.

The Commissioning requirements and associated communications obligations for this process are set out in CoP4. [BSC Procedure \(BSCP\) 514 'SVA Meter Operations For Metering Systems Registered in SMRS'](#) and [BSCP 515 'Licensed Distribution'](#) set out the detailed timescales for these activities.

## Ownership of measurement transformers

Measurement transformers are most commonly owned by LDSOs. In some cases, 'LDSO' may also refer to an Embedded DSO or other private network operator that is a BSC Party. However, for the purposes of this paper these are collectively referred to as LDSOs in line with the BSCPs.

Examples of cases where measurement transformers are not owned by a LDSO are where they are owned by an Independent Connections Provider (ICP) or Building Network Operator (BNO). An ICP is an accredited company entitled to build electricity networks to the specification and quality required for them to be adopted by a LDSO, but it is not a BSC Party. This would normally be seen where the measurement transformer is Commissioned ahead of its ownership being transferred to a LDSO. A BNO is an organisation that owns or operates the Distribution Network within a multiple occupancy building e.g. a block of flats, but it is not a BSC Party. In this example ownership of measurement transformers stays with the BNO.



## What is involved in Commissioning

Commissioning is a process to ensure that the energy flowing across a defined Metering Point is accurately recorded by the associated Metering System.

The instruments used for Commissioning shall be periodically calibrated and calibration records should be retained and be traceable.

Tests on site shall be performed and recorded as appropriate. Tests shall include ensuring measurement transformers are set-up properly as well as ensuring that the meters are set-up so they record at the right point and compensate for errors correctly.

On completion of Commissioning, Metering Equipment should be sealed correctly.

[For more information see CoP4 Guidance on the ELEXON website.](#)

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<sup>1</sup> The person registered in Central Metering Registration Service (CMRS) or, alternatively, the Supplier Meter Registration Service (SMRS) for that Metering System pursuant to BSC Section K. This is normally the Supplier.

<sup>2</sup> Measurement transformers can be either current transformers or voltage transformers and are used to measure current or voltage respectively. Collectively they are referred to as measurement transformers.



## What is the issue?

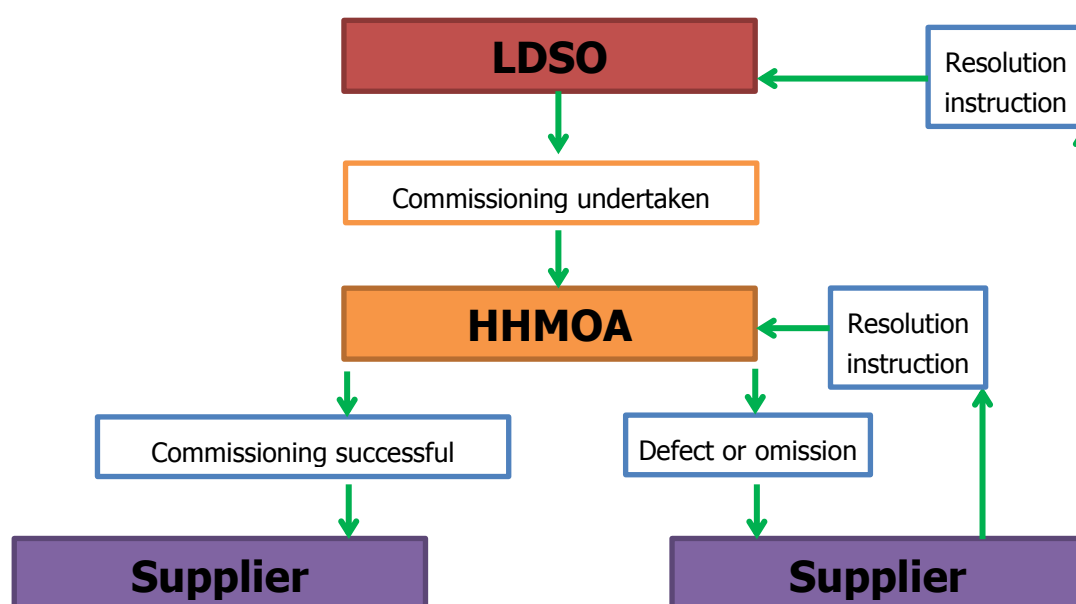
Passing information by email is resource intensive and is difficult to track. Through the Technical Assurance of Performance Assurance Parties (TAPAP) process<sup>3</sup>, we have seen numerous cases of participants not being able to provide evidence of when Commissioning information has been shared. It is also a less secure method of passing confidential information than the other methods commonly used within the industry. The Commissioning process is different where the measurement transformers are owned by a Party than where they are owned by a non-Party<sup>4</sup>.

Defined timescales for omission and defect rectification (i.e. where technical issues are discovered or data is not shared) are not given, so potentially inaccurate data from that Metering System could be used in Settlement for some time until defects are rectified.

Where an LDSO is responsible for Commissioning measurement transformers, CoP4 requires that they prepare, and make available to the appointed HHMOA, complete and accurate Commissioning records in relation to these obligations. Where the measurement transformers are not owned by a LDSO, this responsibility lies with the Registrant. In all cases, it is the responsibility of the HHMOA to notify its Registrant, via an auditable electronic method, that either:

- All items of Metering Equipment have been fully and successfully Commissioned; or
- There is a defect or omission preventing the Commissioning process from being completed

### Diagram showing process flow for Commissioning communications



BSCP 514 section 5.2.2 sets out the timescales for the passing of key information in the Commissioning process. There are three occasions when communications are required:

- The LDSO informs the HHMOA of measurement transformer Commissioning

### What is a TAPAP?

A TAPAP is undertaken by ELEXON to ensure that BSC processes are being conducted properly. They may also be undertaken following a modification to the Code to ensure that the changes are being implemented properly.

As part of the process ELEXON may visit a Party's office to complete and audit as well as undertaking various other assurance activities. The findings of a TAPAP are reported to the Performance Assurance Board (PAB).

[For more information see the Performance Assurance section of the ELEXON website.](#)

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<sup>3</sup> In 2016 ELEXON undertook a TAPAP in relation to how well Parties were meeting the Commissioning obligations introduced by modification [P283 'Reinforcing the Commissioning of Metering Equipment Processes'](#)

<sup>4</sup> Normally BNO, ICP or customer owned

- The HHMOA informs the Supplier that Commissioning has been completed
- The HHMOA informs the Supplier that there was a defect or omission that has prevented complete Commissioning. This could be that the LDSO has not passed on the relevant information as well as any issue with the physical Commissioning.

In order for the process to work the following communications are also required:

- The Supplier instructs the LDSO to resolve a gap in the process regarding measurement transformers
- The Supplier instructs the HHMOA to resolve a gap in the process regarding Metering Equipment

To meet these obligations currently, LDSOs email Commissioning records as PDF email attachments to the appointed HHMOAs. The HHMOAs then email any relevant PDF attachments to their Registrant to notify them of the Commissioning status of the relevant Metering System. Similarly, where there are gaps in the process or issues with completing Commissioning, this information, and corresponding instructions are also passed by email.

## Proposed solution

### New data flows

[CP1496](#) proposes introducing two new data flows for the passing of Commissioning information and to facilitate the additional obligation for whoever carries out the Commissioning to retain all relevant documents. CP1496 also proposes to amend the required timescales for Commissioning by introducing specific deadlines for omission/defect rectification and to split out the process for Party owned measurement transformers from that for non-Party owned measurement transformers.

ELEXON raised the supporting change to the Data Transfer Catalogue (DTC) to create these two new data flows ([DTC CP 3522](#)). These changes were approved for implementation by the Master Registration Agreement (MRA) Decision Board (MDB) on 30 November 2017 with implementation approved for November 2018. The DTC changes will support the new Commissioning process to be introduced by CP1496. The two data flows will be:

- 'DAXXX Notification of Commissioning information'; and
- 'DBXXX Notification of Commissioning status'

***Please note:*** As we are proposing two new data flows, in order to reduce confusion in this paper and the draft redlining they are referred to as DAXXX and DBXXX. The actual numbering of the data flows will be assigned by the MRA Service Company (MRASCo) approximately 2 months before the CP1496 implementation date and will follow the standard 'DXXXX' format (e.g. D0170 or D0215) format. DAXXX and DBXXX are used as placeholders in the BSC Configurable Items amended for CP1496 to allow the ISG and the SVG to approve it before the actual flow numbers are available. The version of these BSC Configurable Items that become effective on the CP1496 implementation date will contain the actual flow numbers.

Data flow DAXXX will be used by the LDSO to inform the HHMOA of measurement transformer Commissioning. It will also be used by the HHMOA internally (but not transmitted) when they have performed their own Commissioning (on behalf of the Registrant) to create a complete Meter System record of Commissioning information.

Data flow DBXXX will be used for;

- HHMOA to communicate gaps or errors in the process to the Registrant;
- Registrant to send instructions to the LDSO or HHMOA, as appropriate, to rectify any gap in the process;
- LDSO or HHMOA to respond to, or send an update on the aforementioned instructions received from the Registrant; and
- HHMOA to inform the Registrant that complete Commissioning has been completed.

### Diagram showing direction of flow for DBXXX



### What is a data flow?

A data flow is a structured message sent over the Data Transfer Network (used by industry participants to share data). Each data flow has a set structure and can be used to transfer specific pieces of information. Within each data flow there will be a list of data that can be included and how it should be represented.

For more information, see [the Data Transfer Catalogue website](#).

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For the purposes of CP1496 there are four possible directions of flow for the DBXXX:

- HHMOA to Registrant
- Registrant to HHMOA
- Registrant to LDSO
- LDSO to Registrant

Note: Both DAXXX and DBXXX will also be able to be used as part of the Change of Agent process. The changes to BSCP514 and BSCP515 to facilitate the use of DAXXX and DBXXX in the Change of Agent process are proposed in CP1497 'Introduction of data flows for Half Hourly Meter Operator Agents (HHMOA) to pass on Commissioning information when there is a Change of Agent (CoA)'.

## Change of timescales

With the increasing number of non-BSC Parties installing Metering Equipment, we propose to define separate Commissioning processes for BSC Party and non-BSC Party owned equipment. This is to provide clarity around the two different processes and the timescales for each scenario.

The new processes will provide the HHMOA with sufficient time to have received the LDSO Commissioning information, inform the Registrant of any defect or omission that has prevented Commissioning and for the Registrant to have then taken steps involving the HHMOA and LDSO where necessary to complete Commissioning. They will also introduce specific timescales for completing defect or omission rectification which currently don't exist.

These revised timescales do provide a slightly longer duration for the end to end Commissioning process and with the timescales still being based around when Energisation occurs (as they do presently). It also provides more opportunity for HHMOA Commissioning on prevailing load. The current and proposed new key stages will be:

Action	Current Timescale	Proposed timescale
LDSO Commissioning	16 working days (WD) after energisation	16 WD after energisation
LDSO pass Commissioning information to HHMOA	22 WD after energisation	21 WD after energisation
HHMOA first attempt at Commissioning	16 WD after energisation	32 WD after energisation
HHMOA advise Supplier of completion after first attempt	5 WD after Commissioning complete; or	5 WD after Commissioning complete; or
HHMOA advise Supplier of defect/omission	5 WD after first attempt	5 WD after first attempt
Supplier resolution of any defect or omission	Nil – this is a new step to make existing obligations clearer	65 WD after energisation
Final deadline for HHMOA to complete Commissioning	Nil – this is a new step to make existing obligations clearer	80 WD after energisation

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## Retention of records

Whichever Party is responsible for completing the Commissioning of a specific item of Metering Equipment will be required to retain the evidence of the Commissioning of that Metering Equipment (rather than emailing it on as a PDF document) for the duration of the Metering System's lifetime. The change to CoP4 requires that they 'make available upon request, complete and accurate calibration records in relation to these obligations'. We envisage that the requirement to 'make available' will include, but not be limited to, when being audited or as part of a relevant investigation.

Changes to the retention of records is the only part of CP1496 that will apply to Central Volume Allocation (CVA) Metering Equipment. Notification of CVA Metering Equipment Commissioning will not change, however, copies of Commissioning evidence will be retained by the Party responsible for Commissioning and produced on request.

## Proposer's rationale

The introduction of the new data flows will facilitate the clear and robust process, as set out in the changes to BSCP514 and BSCP515, with achievable timescales for the exchange of information relating to Commissioning of Metering Systems for new connections. This will be achieved by formalising the passing of information by data flow in line with other industry practices through the use of the Data Transfer Network (DTN) for the passing of Meter related information. In line with current practice, DAXXX and DBXXX will be able to be sent using the DTN 'or other method, as agreed'

A number of industry workgroups have been held to develop this solution with attendance from LDSOs, Embedded DSOs, HHMOAs and Suppliers. This was done in conjunction with updates to and feedback from the MRA Issue Resolution Expert Group (IREG) and the Performance Assurance Board (PAB). It is understood that the groups consulted prior to proposing CP1496 covers parties with interest in both SVA and CVA Meter operations.

## Associated CPs

The workgroup requested that the scope of this work should include the Change of Agent process. However, this would be independent of CP1496 and has been raised as CP1497.

The workgroup also requested the addition of a formal rejection response mechanism and associated data flow that will enable LDSOs to inform the HHMOAs that they are not the measurement transformer owner when the HHMOA requests site technical details. This has been raised as [CP1495 'Introduction of a rejection response data flow for a D0170 'Request for Meter System Related Details' request from the Meter Operator Agent to the Licensed Distribution System Operator where a D0215 'Provision of Site Technical Details' response is required'](#).

Although not dependent on each other, given the shared background of the three CPs, CP1496 was issued for industry consultation at the same time as CP1495 and CP1497. All three CPs will be presented for approval concurrently.

## Proposed redlining

Attachments A-E set out the proposed draft changes to the BSC Configurable Items required to implement the proposed solution.

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## 3 Impacts and Costs

### Central impacts and costs

#### Central impacts

The solution for CP1496 will require changes to five Code Subsidiary Documents (CSDs):

- Changes to CoP4 to reflect changes to the requirements to maintain records;
- Changes to BSCP514 and BSCP515 to reflect changes to the Commissioning time line and communication requirements;
- Changes to BSCP515 to introduce the use of DAXXX; and
- Changes to the SVA Data Catalogue Volumes One and Two will reflect the introduction of new flows into the Data Transfer Catalogue (DTC) once MRASCo has confirmed the new data flow titles following approval by the MDB.

CP1496 has no impact on BSC systems.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none"><li>• Code of Practice 4 – ‘The Calibration, Testing and Commissioning Requirements of Metering Equipment for Settlement Purposes’</li><li>• BSCP514 – ‘SVA Meter Operations For Metering Systems Registered in SMRS’</li><li>• BSCP515 – ‘Licenced Distribution’</li><li>• SVA Data Catalogue Volume 1: Data Flows</li><li>• SVA Data Catalogue Volume 2: Data Items</li></ul>	<ul style="list-style-type: none"><li>• None</li></ul>

#### Central costs

The central implementation costs for CP1496 will be approximately £960 (four ELEXON working days) to implement relevant document changes. The breakdown of costs is as follows:

- One day to implement changes to CSDs; and
- Three days to implement and review changes to the Commissioning of measurement transformers for Settlement purposes (Code of Practice 4) Guidance.

### BSC Party & Party Agent impacts and costs

CP1496 will require HHMOAs, LDSOs and Suppliers to implement system changes to receive the new data flows and they will also need to amend their Commissioning processes. The majority of respondents to CP1496 thought that June 2018 would be too

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soon for them to make the necessary changes to their own internal systems as required by DTC CP3522. To ensure that BSC parties have sufficient time to implement this change, CP1496 is now recommended for implementation on 1 November 2018 as part of the November 2018 BSC Release.

DTC CP3522 was presented to the MDB approved for implementation on 30 November 2017. DTC CP3522 was also recommended for implementation in June 2018. However, following consultation the MDB has also moved the implementation date from June 2018 to November 2018 to allow Parties sufficient time to make changes to their own systems.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
Supplier	Amend systems to create and receive new data flows. Implement changes to Commissioning process to comply with CSD changes.
LDSOs and Embedded LDSOs	Amend systems to create and receive new data flows. Implement changes to Commissioning process to comply with CSD changes.
Half Hourly MOAs	Amend systems to create and receive new data flows. Implement changes to Commissioning process to comply with CSD changes.
Non Half Hourly MOAs	Amend systems to create and receive new data flows. Implement changes to Commissioning process to comply with CSD changes.

## Participant costs

Every respondent to the CP1496 consultation indicated that there would be some cost involved in implementing the changes. Most stated that there would be one off costs for implementation and no on-going costs. Only one respondent gave a figure (£20,000) for implementation whereas most others stated that the cost still needed to be scoped pending the MDB decision the day before the CP1496 consultation closed.

### Recommended Implementation Date

The CP1496 consultation feedback was that a November 2018 implementation date would allow Parties and their Agents sufficient time to make the necessary system changes. Therefore, ELEXON proposes to implement CP1496 on 1 November 2018 as part of the November 2018 BSC Release.

### ISG's views

The ISG considered CP1496 at its meeting on 24 October 2017 ([ISG 199/03](#))

It was confirmed by ELEXON, in response to a Member's question, that CP1496 will only relate to SVA Commissioning timescales and not CVA Commissioning timescales. The reason for this is that there are already sufficient timescales and processes laid down for the CVA Commissioning process. CP1496 will however affect CVA as a result of the proposed changes to CoP4 which will change the obligation on retention of Commissioning records for CVA and SVA alike.

The ISG considered the CP1496 Assessment Report on 16 January 2018 ([ISG 201/01](#)).

It was suggested that records should be held centrally e.g. by LDSOs. This was in light of consultation responses (see Section 6 below) noting that records should be shared with all Parties. The DAXXX and DBXXX will contain some elements of free text and validated fields, which could lead to errors and as such, LDSOs should hold all data as a single point of truth. ELEXON explained that careful consideration was given to developing the data flow fields. There was significant input from the Workgroup as well as other industry groups (mentioned elsewhere in this report). It was felt that the mix of mandatory and conditional fields and validated sets (that was approved by the MDB) rather than a free text field was the best balance. ELEXON pointed out that errors and issues should be an exception. If it became apparent that there were issues with the contents of a DAXXX data flow, then original commissioning records could be requested. Again, it was felt by industry members that this approach would be better overall than continuing with the practice of sharing data by e-mail.

It was commented on by an ISG Member that the DTN should not be fully relied on for future evaluation of data or as an alternative central repository of Commissioning details. Not everyone uses the DTN for sending data flows and that other methods are used for sharing data, even if using the data flow format. ELEXON is aware of this and will take into account when analysing DTN data and will use other sources as appropriate.

The ISG also discussed the potential CP for CT ratio validation. ELEXON outlined initial thoughts for sense checking data, but that the proposal still needs to be finalised.

ELEXON pointed out that CP1496 is only part of the ongoing work regarding Commissioning and that there are other issues still to resolve that are being looked into.

The changes to CoP4 were approved (the other redlined documents are the remit of SVG alone). An ISG Member commented that, in all other respects, CP1496 proposals are very much the remit of the SVG and it would be more appropriate for the SVG to discuss and make the final decision whether or not to approve.

### SVG's initial views

The SVG considered CP1496 at its meeting on 31 October 2017 ([SVG 201/06](#))

Concern was expressed by an SVG Member over the fact that there are a growing number of BNOs and ICPs that are carrying out Commissioning and thus putting obligations on MOAs to ensure that it is done correctly. The issue is that BNOs and ICPs are not obliged under the BSC to retain records or pass on evidence of Commissioning. This is something that ELEXON is aware of and will look into as a future piece of work.

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## 6 Industry Views

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

Summary of CP1496 CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1496 proposed solution?	11	2	0	1
Do you agree that the draft redlining delivers the intent of CP1496?	12	1	1	0
Will CP1496 impact your organisation?	14	0	0	0
Will your organisation incur any costs in implementing CP1496?	13	0	0	1
Do you agree with the proposed implementation approach for CP1496?	3	9	0	2
Do you agree with the new timings for Commissioning proposed as part of the CP1496 solution?	14	0	0	0
Do you agree with the new timings for defect or omission rectification proposed as part of the CP1496 solution?	13	1	0	0
Do you agree that Commissioning records should be retained by those responsible for Commissioning rather than being transferred to the Meter Operator Agent?	13	1	0	0
Do you have any further comments on CP1496?	5	9	0	0

### Proposed Solution

Most respondents (12 out of 14) agreed with the CP1496 proposed solution. One respondent agreed with CP1496 but their responses to CP1496 and CP1497 were the same and raised concerns over CP1497. This response has been classified as 'other', though, as they are in agreement with CP1496. Of the 12 that agreed with the proposal, eight provided rationale for their agreement and in all cases commented that the introduction of data flows was an improvement on the current process as well as bringing efficiencies.

One of the respondents that agreed with the implementation also added that whilst they agree with the CP1496 proposed solution, they believe that a fuller review of the Commissioning process is required and particularly incomplete Commissioning records.

Of the two respondents that disagreed with the proposed solution, one of them raised concerns over whether or not MOAs' responsibilities were going to change. However, when ELEXON assured them that that this was not the case and only the record keeping responsibilities will change, they were happy with the proposed solution.

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One respondent disagreed with the proposed solution entirety. They made several points in their response, which are paraphrased with our response are in the following table:

Comments disagreeing with the CP1496 Proposal	
Respondent's comment	ELEXON's Response
The introduction of the DAXXX data flow will create a cost impact that is highly likely to exceed current resource expense and would have 'little or no benefit to companies or customers';	We understand that for some companies the current processes work well and for those few, there is no need to change and as such, the introduction of the new data flows will have little or no benefit. However, we consider the risk to industry and Settlement, rather than case by case. From this perspective we believe change is needed. This assertion has also been confirmed by other consultation responses as well as anecdotal comments from the TAPAP process and the workgroup formed to develop this CP solution.
They would 'be required to exchange the calibration certificates via the current route regardless of the proposal'	Changes to CoP4 will mean that there is no need to exchange calibration certificates and indeed, it would be the responsibility of whoever conducts the Commissioning to retain the relevant records.
The CP1496 proposal does not make the case for why the current process is difficult to audit	Feedback from the BSC Auditor, the Technical Assurance Agent (TAA) and our own TAPAP found that it was difficult to audit emails sent to MOAs as they could not, in all cases actually provide the required e-mail evidence. This was further backed up by anecdotal evidence from MOAs and was mentioned in the workgroups that developed the proposed solution that led to the raising of CP1496 (as well as CP1495 and CP1497).
Delays in information retrieval are not due to the inability to locate Commissioning records but, in fact, are due to the lack of records actually existing. This is a known issue for a number of companies and may reflect a number of different issues and explained that if they do not hold the records, they cannot populate the data flows	We are aware that there are several issues around the Commissioning process and we are looking into them. CP1496 (alongside CP1495 and CP1497) is only a small part of a large work programme. We have engaged with industry to date on Commissioning issues and will continue to do so.

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## Commissioning and omission rectification timescales

All 14 respondents agreed with the proposed timelines for Commissioning. One respondent welcomes the extended timescales for MOAs to attempt Commissioning for the first time.

Another commented that they see this as continuation of P283 and CP1458 in terms of 'hardening' timescales. One respondent, whilst in agreement with the timescales, mentioned that monitoring key deadlines may require development of additional tools.

Of the 14 respondents, all but one agreed with the timescales for defect/omission rectification. However, amongst those that agreed there were some caveats. One respondent pointed out that 80 days may not always be achievable and that a wider review of Commissioning is required. Another pointed out that some timescales just may not be achievable for reasons out of their control e.g. if an outage is required to investigate or rectify an issue.

The one respondent that disagreed with the proposed defect/omission timescales did so on the basis that no timings have been indicated for the LDSO/HHMOA to respond to the Supplier by sending a DBXXX data flow.

### **ELEXON response**

We intentionally omitted timescales for the LDSO/HHMOA to respond to the Registrant. This allows greater flexibility in resolving issues within the required timescales where there is no prescribed requirement to send DBXXX data flows until the issue is resolved fully.

We would expect that each Party would take their own approach to the monitoring of the key deadlines and, as such, it would be their choice on whether or not to make system and /or process changes or implementations.

### **Commissioning records**

All but one respondent agreed that Commissioning records should be retained by those responsible for Commissioning rather than being transferred to the MOA. The reason for the disagreement was that they believe that the Commissioning record should be held by all parties relevant to the Commissioning process. If the Commissioning records are held by the Supplier, HHMOA and LDSO, it will ensure the accuracy of the Metering and therefore the subsequent Commissioning carried out by the HHMOA. They argued that without proof of Commissioning from the LDSO they will be unclear of what the ratio etc. will be. One of the respondents that agreed with the proposal for the retention of Commissioning records also raised a question about whether or not the MOAs would be able to request Commissioning records.

One respondent questioned how the proposal would cover ICPs (who are not obliged to comply with the BSC or it's CSDs). This is something that was raised by the SVG prior to consulting on the CP1496 proposed solution (see above).

### **ELEXON response**

The premise of CP1496 is that DAXXX should be seen as the proof of Commissioning being completed and for the purpose of the MOA overall accuracy assessment. The requirement to create a full CoP4 complaint Commissioning record still exists, but we would only expect LDSO/HHMOAs to ask for original records of Commissioning if there is any doubt over the information they have received via the DAXXX data flow.

We are aware of the wider issue of ICPs and BNOs and their role in the Commissioning process. This is something that ELEXON will look into as a separate piece of work.

## Comments on the proposed redlining

Of the 14 respondents, only one disagreed with the proposed redlined text. They stated that from their understanding of the associated DTC changes, the intent is that on receipt of a DBXXX flow from a Supplier, the LDSO will use the DBXXX data flow to communicate back to the Supplier to inform them of any action taken to resolve an omission or defect that is relating to the measurement transformer. They added that the BSCP changes do not include this scenario.

The proposed change to BSCP514 paragraph 5.2.2.A.6 states that DBXXX data flow should be sent to report resolution to the defect or omission. We did not prescribe how this should be done because each Party/Agent will perform different activities to meet the Commissioning requirements within the resolution timescale. We have not stated how many times they should communicate with each other during this time either. DBXXX only provides a vehicle to do so with the data flow if required. Similarly, where a LDSO is responsible for Commissioning, once Commissioning is achieved, they will send a DAXXX to the MOA.

The redlined changes in BSCP515 and BSCP514 make reference in a footnote to BSCP515 3.15. However, section 3.15 was not included in the draft redlining for CP1496. One of the data sets in the DAXXX data flow is for measurement transformer ratios. As part of our work into Commissioning we identified that these are not always accurate when sent and, in some cases, could be spurious. We are proposing that LDSOs submit measurement transformer ratios to ELEXON; we will then validate them and publish a consolidated list.

The table for 3.15 would have laid down the process for LDSOs to e-mail their data to ELEXON. However, as this would be addressing a different issue (i.e. the accuracy of data), it was decided not to include the table within the CP1496 proposal and we will, instead raise a separate CP to make this addition. The cross reference to BSCP515 3.15 will be removed from the draft redlining submitted to the ISG and the SVG for approval.

Comments on the CP1496 Proposed Redlining		
Document & Location	Comment	ELEXON's Response
CoP4 - P6 5.5.4 Records	"Where measurement transformers are owned by a BSC Party, that Party". Needs a comma	This is in keeping with the syntax of CoP4. No change has been made to the draft redlining
CoP4 - P6 5.5.4 Records	All evidence must be Traceable – needs a lower case "t" – not a defined term.	Traceable is a defined term within CoP4, so in this context it is correct that it is capitalised. No change has been made to the draft redlining
SVA Data Catalogue Volume 1 Appendix A	The SVA Data Catalogue Volume 1 – Data Interfaces Appendix A do not indicate a DBXXX LDSO to Supplier instance of the data flow.	This is intentional. The registrant will use the DBXXX to instruct the LDSO carry out work. However, when Commissioning is fully achieved, the LDSO should then send a DAXXX to the HHMOA. No change has been made to the draft redlining

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## Additional comments

Five respondents made additional comments outside of the eight questions that were asked. Their comments, and ELEXON's response, are in the table below:

Additional Comments on the CP1496 Proposal	
Comment	ELEXON's Response
Will there be any rules which detail how this data is stored by the Commissioning party, for example will it be .JPEG, .PNG, paper, Excel, Word or PDF? At the moment we see all of the above.	We have not considered setting any requirements but this is certainly something we could consider as part of the ongoing work on the Commissioning process.
CoP4 should be prescriptive about the tests the LDSO and MOAs conduct to complete their Commissioning Test. CoP4 should also mandate the forms on which the results are recorded. At the moment everyone takes a different approach and completes their own version of a Commissioning document. The next step should be to standardise this nationally.	This would require a review of CoP4 and is out of scope of CP1496. Parties are able to raise a BSC issue if this is required.
Are there any documented changes to the Technical Assurance process? For example, will the TAA request Commissioning evidence from the current MOA, or the old MOA who completed the Commissioning test?	Work is already underway to align the work of the TAA with P283 and who the non-compliances are allocated against. BSCP27 3.5.4 currently states that records will be given to the TAA by the Registrant, MOA or LDSO (or Transmission Company) so does not need to be changed with the amendments to CoP4 proposed by this CP. We will also look at how to incorporate any other elements of CP1496, if appropriate.
We suggest that one of the easiest methods to improve the Commissioning process may be to remove the requirement to issue calibration certificates and that the National Measurement Transformer Error Statement tolerances should be used instead.	The issue of calibration certificates was discussed by the Workgroup that developed CP1496. They concluded that due to the complexity of including actual calibration errors in the data flow these should be omitted from the detail of the flow. There is however, a separate Workgroup looking at improving the overall accuracy process and moving away from the need for calibration certificates where possible.
To ensure that there is a robust process in place to allow Suppliers to resolve defects/omissions, and take appropriate action against Non BSC & BSC Parties, we believe that it would be beneficial if a DCUSA change was raised. This would require Distributors to provide Commissioning records and incentivise them to ensure that their Commissioning	This is something that we can consider as part of our wider work into improving the Commissioning process. In the meantime, we would suggest that if Parties feel strongly about this, they may wish to investigate the DCUSA change process.

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## Additional Comments on the CP1496 Proposal

Comment	ELEXON's Response
records are provided.	
Will Elexon be providing any guidance notes regarding CP1496?	We will be providing guidance notes. We are also looking into providing training sessions too.
We believe there was a great deal of improvement in cross-code working between the BSC and MRA in developing these proposals. We do, however, believe it is necessary for the equivalent committees to have sight of the industry responses to both Code consultations prior to making a decision to approve or reject. This would enable both committees to be in a possession of the full industry view ahead of making a decision. We have raised the same point under the MRA and would welcome ELEXON considering how this could work under the BSC to support CACoP.	Cross code cooperation is something that ELEXON supports and processes are being put in place for even greater co-ordination between Codes. We will take forward this suggestion for inclusion in how we co-ordinate cross Code change.

## 7 Recommendations

We invite you to:

- **APPROVE** the proposed changes to CoP4 for CP1496;
- **APPROVE** CP1496 for implementation on 1 November 2018 as part of the November 2018 Release;
- **AGREE** and approve the amendments to the proposed redlining for BSCP514 and BSCP515 and SVA Data Catalogue Volume 1, SVA Data Catalogue Volume 2 for CP1496 made following the CP Consultation; and
- **NOTE** that CP1496 was also presented to the ISG on 16 January 2018 for decision.

## Appendix 1: Glossary & References

### Acronyms

Acronyms	
Acronym	Definition
BNO	Building Network Operator
BSC	Balancing and Settlement Code
BSCP	BSC Procedure
CMRS	Central Meter Registration Service
CoP4	Code of Practice Four
CP	Change Proposal
CPC	Change Proposal Circular
CT	Current transformer
CVA	Central Volume Allocation
DTC	Data transfer Catalogue
HH	Half Hourly
HHMOA	Half Hourly Meter Operator Agent
ICP	Independent Connections Provider
IREG	Issue Resolution Export Group
ISG	Imbalance Settlement Group
LDISO	Licensed Distribution System Operator
MRA	Master Registration Agreement
MRASCo	MRA Service Company
PAB	Performance Assurance Board
SMRS	Supplier Meter Registration Service
SVA	Supplier Volume Allocation
SVG	Supplier Volume Allocation Group
TAA	Technical Assurance Agent
TAPAP	Technical Assurance of Performance Assurance Parties
WD	Working Day
DTN	Data transfer Network

### DTC data flows and data items

CP1496 itself will not have any impact on existing DTC data flows and data items. As mentioned above, DTC CP 3522 is proposing the introduction of two new data flows and with the new data items associated with each of these. Once the MDB has decided to implement DTC CP 3522, then ELEXON will be notified of the names and numbers of the new data flows and data items.

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## 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	CoP4 on ELEXON website	<a href="https://www.elexon.co.uk/bsc-and-codes/bsc-related-documents/codes-of-practice/">https://www.elexon.co.uk/bsc-and-codes/bsc-related-documents/codes-of-practice/</a>
2	BSCP514	<a href="https://www.elexon.co.uk/bsc-and-codes/bsc-related-documents/bscps/?show=all">https://www.elexon.co.uk/bsc-and-codes/bsc-related-documents/bscps/?show=all</a>
2	BSCP 515	<a href="https://www.elexon.co.uk/bsc-and-codes/bsc-related-documents/bscps/?show=all">https://www.elexon.co.uk/bsc-and-codes/bsc-related-documents/bscps/?show=all</a>
2	'CoP4 Commissioning of measurement transformers for Settlement purposes' on ELEXON website	<a href="https://www.elexon.co.uk/bsc-and-codes/bsc-guidance-notes/">https://www.elexon.co.uk/bsc-and-codes/bsc-guidance-notes/</a>
3	Modification P283 webpage	<a href="https://www.elexon.co.uk/mod-proposal/p283/">https://www.elexon.co.uk/mod-proposal/p283/</a>
3	Performance Assurance page on ELEXON website	<a href="https://www.elexon.co.uk/reference/performance-assurance/">https://www.elexon.co.uk/reference/performance-assurance/</a>
4	DTC webpage	<a href="https://dte.mrasco.com/default.aspx">https://dte.mrasco.com/default.aspx</a>
5	CP1496 Webpage	<a href="https://www.elexon.co.uk/change-proposal/cp1496/">https://www.elexon.co.uk/change-proposal/cp1496/</a>
4	MRA Change Tracker	<a href="https://mra.mrasco.com/change-tracker/">https://mra.mrasco.com/change-tracker/</a>
6	CP1458 webpage	<a href="https://www.elexon.co.uk/change-proposal/cp1458/">https://www.elexon.co.uk/change-proposal/cp1458/</a>
6	CP1495 webpage	<a href="https://www.elexon.co.uk/change-proposal/cp1495/">https://www.elexon.co.uk/change-proposal/cp1495/</a>
6	CP1497 webpage	<a href="https://www.elexon.co.uk/change-proposal/cp1497/">https://www.elexon.co.uk/change-proposal/cp1497/</a>
11	ISG 199 Papers and reports	<a href="https://www.elexon.co.uk/meeting/isg-199/">https://www.elexon.co.uk/meeting/isg-199/</a>
11	ISG 201 Papers and reports	<a href="https://www.elexon.co.uk/meeting/isg-201/">https://www.elexon.co.uk/meeting/isg-201/</a>
12	SVG 201 papers and reports	<a href="https://www.elexon.co.uk/meeting/svg-201/">https://www.elexon.co.uk/meeting/svg-201/</a>