

# CP Assessment Report

## CP1497 'Introduction of dataflows for Half Hourly Meter Operator Agents to pass on Commissioning information when there is a Change of Agent'

**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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### Contact

**Cal Lynn**

020 7380 4207

[cal.lynn@elexon.co.uk](mailto:cal.lynn@elexon.co.uk)



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### About This Document

This document is the Change Proposal (CP) Assessment Report for CP1497 which ELEXON will present to the Supplier Volume Allocation Group (SVG) at its meeting on 30 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 CP1497.

There are four 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 SVG's initial views on the proposed changes and the views of respondents to the CP Consultation.
- Attachments A and B contain the proposed redlined changes to deliver the CP1497 solution.
- Attachment C contains the full responses received to the CP Consultation.

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# 1 Why Change?

## Background

Whenever new Metering Systems are installed, it is essential to ensure that the correct Commissioning process is followed. [Code of Practice 4 \(CoP4\) 'The Calibration, Testing and Commissioning Requirements of Metering Equipment for Settlement Purposes'](#) sets out the requirements for the Commissioning of Metering Systems. It also details obligations for the communication of Commissioning information between the Licenced Distribution System Operators (LDSOs) and Meter Operator Agents (MOAs), and of the status of the Metering System between Registrants and their MOAs.

Where the measurement transformers are owned by a Balancing and Settlement Code (BSC) Party<sup>1</sup>, that Party is responsible for the Commissioning of Metering Equipment up to and including the testing facilities. Where measurement transformers are not owned by a BSC Party, Commissioning is the Registrant's responsibility via their appointed MOA.

The Registrant has the overarching responsibility to ensure Commissioning is completed. However it delegates its Commissioning responsibilities to its MOA. The MOA will in all cases perform the Commissioning of its own equipment and ensure that the complete Metering System complies with the requirements of the applicable CoPs, including the assessment of overall accuracy.

Where a Party is responsible for Commissioning of measurement transformers, CoP4 requires that they prepare, and make available to the appointed MOA, complete and accurate Commissioning records in relation to these obligations. To achieve these obligations set out by CoP4, LDSOs send their Commissioning records and calibration certificates to the MOAs via email. The MOAs contact their Suppliers by email to notify them of the Commissioning status. This will note that there is either a gap in the procedure that has prevented the complete Commissioning process (missing records from the LDSO or no physical Commissioning was possible) or that the process has been fully completed.

[Balancing and Settlement Code Procedure \(BSCP\) 514 'SVA Meter Operations For Metering Systems Registered in SMRS'](#) section 5.2.2 sets out the timescales for the passing of key information in the Commissioning process. There are three types of communications that are required:

- The LDSO informs the Half Hourly (HH) MOA of measurement transformer Commissioning;
- The HHMOA informs the Supplier that Commissioning has been completed; and
- 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; and/or
- The Supplier instructs the HHMOA to resolve a gap in the process.

<sup>1</sup> Normally a Licensed Distribution System Operator (LDSO), Embedded DSO or Transmission System Operator (TSO).



## 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.

On completion of Commissioning a Proving test shall be completed to ensure that the data recorded by the Metering System can be transferred to Settlement.

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

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To meet these obligations currently, LDSOs email Commissioning records as PDF attachments to the appointed HHMOAs. The HHMOAs will 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.

## Change of Agent

The current Change of Agent (CoA) process in BSCP514 does not provide any formal mechanism to transfer Commissioning information between old and new Suppliers and their Agents. The only option available is to pass this information by email that runs the risk of critical Commissioning information not being passed on.

Furthermore, where a CoA event happens before the Commissioning process has been completed, there is no mechanism for the new MOA to know what further work may need to be carried out upon a CoA.

Finally, where there is a Change of Supplier (CoS) concurrent with the CoA, there is no mechanism for the Supplier to be informed of the Commissioning status of the relevant Metering System. As the Registrant, the Supplier has an overall obligation for ensuring the Metering System is compliant with the relevant CoP. This means that there is a risk that they may not know if they need to take action to resolve any issues that may have occurred during the Commissioning process.

[CP1496 'Introduction of two data flows for the Commissioning process \(implemented with P283<sup>2</sup>\) for HH Supplier Volume Allocation \(SVA\) Current Transformer \(CT\) operated Metering Systems'](#) has been raised in parallel with this CP to introduce additional dataflows to facilitate the communication of Commissioning information between the relevant Party or Agent for the new connections process.

## What is the issue?

The passing of information from MOA, LDSOs and Supplier by email is both time consuming and labour intensive; it is difficult to track and audit for both completeness of the process and compliance with [BSC Section L 'Metering'](#).

Through the Technical Assurance of Performance Assurance Parties (TAPAP) process for [P283 'Reinforcing the Commissioning of Metering Equipment Processes'](#) introduced in November 2014, we have seen numerous cases of participants not being able to show evidence of when Commissioning information has been shared.

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<sup>2</sup> [P283 'Reinforcing the Commissioning of Metering Equipment Processes'](#)

### Proposed solution

[CP1497 'Introduction of data flows for Half Hourly Meter Operator Agents to pass on Commissioning information when there is a Change of Agent'](#) was raised by ELEXON on 16 October 2017.

This CP will enable additional uses for the Commissioning dataflows also introduced by CP1496<sup>3</sup>. While these dataflows will primarily be used in the new connection process for the LDSO, MOA and Supplier to complete the Commissioning process, this CP proposes to also apply them to any subsequent CoA activity following the new connection process, and thereby facilitate the passing of Commissioning information on a CoA.

The extension of these dataflows to the CoA process will introduce a more efficient and secure way for the passing of Commissioning information from the old MOA to the new MOA. This will also enable the old MOA to advise the new MOA and/or Supplier of any defects or omissions to the process that arose during the Commissioning process, prior to the CoA (and any concurrent change of Supplier) taking place.

The two dataflows will address four different scenarios within the CoA (and any concurrent change of Supplier) process:

- Scenario 1: All Commissioning has been completed and all information is available prior to the CoA.
- Scenario 2: Measurement transformer Commissioning information is available but the MOA was not able to complete the Commissioning process before the CoA took place. This information will be sent from the old MOA to the new MOA and from the new MOA to the Supplier.
- Scenario 3: Measurement transformer Commissioning information is not available because it had not been received from the LDSO to the old MOA before the CoA took place. The MOA work has also not been completed in this scenario. Commissioning information will be sent from the old MOA to the new MOA and from the new MOA to the Supplier.
- Scenario 4: Measurement transformer Commissioning information is not available because it had not been received by the old MOA before the CoA took place. The MOA Meter Commissioning has been done (but overall accuracy has not because the measurement transformer information has not been received). Information will be sent from the old MOA to the new MOA and from the new MOA to the Supplier.

BSCP514 sections 5.2.1, 5.2.4 and 5.2.5 will be revised to reference the two new 'DAXXX' and 'DBXXX' dataflows to enable the passing of Commissioning information. There are also additional steps added to the current processes for 'Change of HHMOA (no change of Metering System or change of Supplier)' and 'Concurrent Change of Supplier and HHMOA (no change to Metering System)'.

<sup>3</sup> The first dataflow ('DAXXX Notification of Commissioning information') will be used by the Party to inform the MOA of measurement transformer Commissioning. It will also be used for the MOA to complete internally when they have performed their own Commissioning to create a complete Metering System record of Commissioning information. The second dataflow ('DBXXX Notification of Commissioning status') will be used for the MOA to communicate gaps or errors in the process to the Registrant and for the Registrant to send instructions to the LDSO or MOA to rectify any gap in the process.

## Proposer's rationale

The introduction of the new dataflows for the CoA process will provide a clear and robust process, with achievable timescales, for the exchange of information relating to Commissioning of Metering Systems for new connections. This will bring the passing of Commissioning information by dataflow into line with standard practice through the use of the Data Transfer Network (DTN) for the passing of Meter related information.

## TAPAP Check

During the P283 TAPAP checks that were performed in 2016, feedback from industry (which included responses from LDSOs, MOAs and Suppliers) indicated that a dataflow would make fulfilling Commissioning obligations in the new connection process more efficient. Two specific recommendations that came from the TAPAP check were:

- The first recommendation was to introduce timescales into BSCP514 and BSCP515 'Licensed Distribution'. This was introduced with the implementation of CP1458 'Introduction of timescales for the P283 Commissioning process for SVA CT operated Metering Systems' in November 2016; and
- The second recommendation was the creation of a set of dataflows to facilitate the communications of Commissioning between Parties and their Agents.

The introduction of new dataflows will provide a clear and robust process, with achievable timescales, for the exchange of information relating to Commissioning of Metering Systems for new connections. It will also bring the passing of information by dataflow into line with how other Metering Systems related information is shared.

Five Workgroup meetings have been held by ELEXON and attended by LDSOs, embedded Distribution System Operators (DSOs), MOAs and Suppliers to help develop this solution. These Workgroups were held in conjunction with updates to and feedback from the Master Registration Agreement (MRA) Issue Resolution Expert Group (IREG) and the BSC Performance Assurance Board (PAB).

The Workgroup also requested the addition of a formal rejection response mechanism and associated dataflow 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 dataflow 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'](#).

## Proposed redlining

Attachments A and B contains the proposed changes to BSCP514 and [SVA Data Catalogue Volume 1: Data Flows](#) to deliver CP1497.

Please note that further changes are being made to BSCP514 by CP1496. These changes do not conflict with changes made by CP1497.



### 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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## 3 Impacts and Costs

### Central impacts and costs

#### Central impacts

CP1497 will require changes to two Code Subsidiary Documents (CSDs):

- BSCP514 will reflect changes to the Commissioning timeline and communication requirements introducing new dataflows; and
- Changes to the SVA Data Catalogue Volumes One 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.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none"><li>• BSCP514</li><li>• SVA Data Catalogue Volume 1</li></ul>	<ul style="list-style-type: none"><li>• <i>None</i></li></ul>

#### Central costs

The central implementation costs for CP1497 will be approximately £240 (one ELEXON Working Day (WD)) to implement the relevant document changes.

### BSC Party & Party Agent impacts and costs

CP1497 will impact HHMOAs and Suppliers as they will be required to implement system changes to receive the new dataflows and will need to amend their Commissioning processes.

Nine of the twelve respondents to the CP Consultation indicated that they would be impacted by CP1497. Respondents noted that implementing this CP would require changes to company systems and processes as they would need to make adjustments to include new dataflows. The scale of the impact was not highlighted by respondents. Two respondents did not identify any impact, while one respondent did not provide a comment.

Of the nine respondents impacted, seven indicated that there would be associated costs incurred in implementing CP1497. The majority of these respondents indicated that these would mostly be one-off costs surrounding the implementation of the CP. Respondents did not highlight the level of the costs. One respondent noted that their third party database would need to go through a whole change cycle and that cost would be ongoing to trigger data flows and manage expectations.

Of the remaining three respondents, one respondent indicated that there may be a cost incurred but that they would not be able to provide further details on this until closer to the Implementation Date, should this CP be approved. One respondent did not foresee any potential costs while the final respondent did not provide a comment on impacts or costs for this CP.

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BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
Suppliers	Amend systems to create and receive new dataflows.
HHMOAs	Implement changes to Commissioning process and systems to comply with CSD changes.

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### Recommended Implementation Date

CP1497 was originally proposed for implementation on 28 June 2018 as part of the June 2018 BSC Release. Five respondents to the CP Consultation agreed with the implementation approach and one respondent was neutral.

The majority of respondents to CP1497 thought that June 2018 would be too 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, CP1497 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.

ELEXON therefore recommends that for efficiency of implementing cross-code changes, the Implementation Date for CP1497 should be amended to **1 November 2018** as part of the November 2018 BSC Systems Release.

### SVG's initial views

CP1497 was presented to the SVG for information at its meeting on 31 October 2017 ([SVG201/07](#)).

The SVG Chairman noted that DTC CP 3523 includes both dataflows for CP1496 and CP1497, in order to improve communication, so effectively it is a two pronged approach.

Additionally, the SVG Chairman highlighted that the draft redlining for both CP1496 and CP1497 have been kept separate and drafted against the current baselined version of the applicable BSCPs for each CP.

The SVG did not provide any further comments or additional questions to include in the consultation.

## 6 Industry Views

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

Summary of CP1497 CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1497 proposed solution?	9	1	2	0
Do you agree that the draft redlining delivers the intent of CP1497?	10	0	2	0
Will CP1497 impact your organisation?	9	2	1	0
Will your organisation incur any costs in implementing CP1497?	7	3	1	1
Do you agree with the proposed implementation approach for CP1497?	5	6	1	0
Do you have any further comments on CP1497?	2	10	0	0

### Comments on the CP

We received twelve responses to the CP Consultation for CP1497. Of these respondents, nine agreed with the proposed solution, one disagreed and two respondents remained neutral. One respondent noted they supported this CP as it should help improve the process around commissioning and make things more linear and streamlined for all parties. Another Party highlighted that the proposed solution will provide a more robust mechanism for the transfer of commissioning information, and notification of any defects.

Additional Comments		
Document & Location	Comment	ELEXON's Response
IMServ Europe (UKDC)	<p>Given the complexity of the changes we think the proposed Implementation Date is optimistic. Because we are dealing with a new flows and new data items it will be necessary for MOPs (and DNOs) to migrate their existing portfolios so the new flows can be sent for existing sites, we do have some concerns that if this is not done properly then we may see missing, incomplete or inaccurate flows circulating for many years to come. To ensure consistency there is a need for a guidance document for</p>	<p>ELEXON replied to this additional comment, making IMServ aware that ELEXON now planned to move the Implementation Date from June 2018 to November 2018. This decision has been made based on responses from Parties following the CP Consultation.</p>

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Additional Comments		
Document & Location	Comment	ELEXON's Response
	all parties containing rules for retrospectively populating new flow fields.	
SSE Energy Supply Limited	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.	ELEXON responded that they will consider how communication could be improved in cross code working. It was noted that at present it is ELEXON's standard practice to publish all Modification and CP Consultation responses on the relevant page of each change on the ELEXON website no more than 5 Working Days after the deadline for responses. In so this allows for those to see responses to ELEXON's Modifications and CPs.

## Comments on the proposed redlining

Ten respondents to the CP Consultation agreed with the proposed redlining, while two respondents made no comments in their response.

## 7 Recommendations

We invite you to:

- **APPROVE** the proposed changes to BSCP514 and SVA Data Catalogue Volume 1 for CP1497; and
- **APPROVE** CP1497 for implementation on 1 November 2018 as part of the November 2018 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
BSCP	BSC Procedure
CoA	Change of Agent
CoS	Change of Supplier
CoP4	Code of Practice Four
CP	Change Proposal
CPC	Change Proposal Circular
CSDs	Code Subsidiary Documents
CT	Current Transformer
DSO	Distribution System Operator
DTC	Data Transfer Catalogue
DTN	Data Transfer Network
HH	Half Hourly
HHMOA	Half Hourly Meter Operator Agent
IREG	Issue Resolution Export Group
LDSO	Licensed Distribution System Operator
MOA	Meter Operator Agent
MRA	Master Registration Agreement
MDB	MRA Development Board
MRASCo	MRA Service Company
PAB	Performance Assurance Board ( <i>Panel Committee</i> )
SMRS	Supplier Meter Registration Service
SVA	Supplier Volume Allocation
SVG	Supplier Volume Allocation Group ( <i>Panel Committee</i> )
TAPAP	Technical Assurance of Performance Assurance Parties
WD	Working Day

### 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.

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External Links		
Page(s)	Description	URL
2	CoP4 page on the 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	CoP4 guidance note on the 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	BSCPs page on the ELEXON website	<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>
3	CP1496 page on the ELEXON website	<a href="https://www.elexon.co.uk/change-proposal/cp1496/">https://www.elexon.co.uk/change-proposal/cp1496/</a>
3	BSC Sections page on the ELEXON website	<a href="https://www.elexon.co.uk/bsc-and-codes/balancing-settlement-code/bsc-sections/">https://www.elexon.co.uk/bsc-and-codes/balancing-settlement-code/bsc-sections/</a>
3	P283 page on the ELEXON website	<a href="https://www.elexon.co.uk/mod-proposal/p283/">https://www.elexon.co.uk/mod-proposal/p283/</a>
4	CP1497 page on the ELEXON website	<a href="https://www.elexon.co.uk/change-proposal/cp1497/">https://www.elexon.co.uk/change-proposal/cp1497/</a>
5	CP1458 page on the ELEXON website	<a href="https://www.elexon.co.uk/change-proposal/cp1458/">https://www.elexon.co.uk/change-proposal/cp1458/</a>
5	Performance Assurance page of ELEXON website	<a href="https://www.elexon.co.uk/reference/performance-assurance/">https://www.elexon.co.uk/reference/performance-assurance/</a>
6	DTC webpage	<a href="https://dtc.mrasco.com/default.aspx">https://dtc.mrasco.com/default.aspx</a>
6	SVA Data Catalogue page of ELEXON website	<a href="https://www.elexon.co.uk/csd/sva-data-catalogue-volume-1-data-interfaces/">https://www.elexon.co.uk/csd/sva-data-catalogue-volume-1-data-interfaces/</a>
10	SVG201 page of the ELEXON website	<a href="https://www.elexon.co.uk/meeting/svg-201/">https://www.elexon.co.uk/meeting/svg-201/</a>