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**Contact****Claire Kerr**

020 7380 4293

[claire.kerr@elexon.co.uk](mailto:claire.kerr@elexon.co.uk)

## CP1498 'Updates to BSCP537 Appendix 1 'Self-Assessment Document' to incorporate an additional question for Meter Operator Agents on Meter Operation Code of Practice Agreement Accreditation'

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### About This Document

This document is the Change Proposal (CP) Final Report for CP1498 which ELEXON has published following the final decision from the Imbalance Settlement Group (ISG), Performance Assurance Board (PAB) and Supplier Volume Allocation Group (SVG) to approve CP1498.

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 ISG/PAB/SVG's views on the proposed changes and the views of respondents to the CP Consultation, along with the final decision on whether to approve this change.
- Attachment A contains the proposed redlined changes to deliver the CP1498 solution.
- Attachment B contains the full responses received to the CP Consultation.

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# 1 Why Change?

## Background

[Balancing and Settlement Code \(BSC\) Section J 'Party Agents and Qualification under the Code'](#) defines the key functions of a Meter Operator Agent (MOA) as being to install, commission, test, maintain, rectify faults with, and provide a sealing service for Metering Equipment (including, if applicable, associated Communications Equipment). This is in accordance with the provisions of [BSC Section L 'Metering'](#) (except to the extent that BSC Section L and the [Codes of Practice \(CoP\)](#) require the Equipment Owner to perform such activities).

BSC Section J also states that a Party shall only appoint and use Party Agents who are Qualified in respect of the functions to be carried out. In order to achieve this, each Party shall ensure that its Party Agents comply in full with the relevant Qualification Requirements and Qualification Process.

## BSC Qualification

The Qualification process is outlined in BSC Section J and set out in full in [BSC Procedure \(BSCP\) 537 'Qualification Process for SVA Parties, SVA Party Agents and CVA Meter Operators'](#). Prospective Suppliers and/or prospective Party Agents ('applicants') are required to complete the ['Self-Assessment Document' \(SAD\)](#) (which is Appendix 1 to BSCP537) and submit it to ELEXON. ELEXON's review of the submitted SAD forms the basis of the Qualification process in order to identify if the applicant would pose any risk to Settlement and the operation of the BSC.

The SAD is split into sections by the role being sought by the applicant. The MOA sections in the SAD are split into Business Processes and Mitigating Controls. The sections for Supplier Volume Allocation (SVA) Half Hourly (HH) MOA (Section 13), SVA Non Half Hourly (NHH) MOA (Section 14) and Central Volume Allocation (CVA) MOA (Section 15) contain questions about the processes of installation of Meters conforming to the CoP. However, the focus of the MOA Qualification is for a MOA to demonstrate that they can provide requested data to other Parties and to inform Parties impacted by any changes made to Metering Systems (as set out in [BSCP514 'SVA Meter Operations for Metering Systems Registered in SMRS'](#) and [BSCP550 'Shared SVA Meter Arrangement of Half Hourly Import and Export Active Energy'](#)).

## MOCOPA® Accreditation

The [Meter Operation Code of Practice Agreement \(MOCOPA®\)](#) is an agreement between electricity distribution businesses and MOAs in Great Britain, which defines safety, technical and business interface requirements regarding the provision of Meter operation services. It is primarily a health and safety accreditation; however it does provide a level of assurance that a MOA can carry out the functions as described in BSC Section L (the physical installation of the Meter). Therefore a BSC Qualified MOA is expected to also obtain MOCOPA® Accreditation or have a relevant contractual agreement in place with a MOCOPA® accredited third party. MOCOPA® requires Parties to confirm who they contract with, to do the physical work and this is audited annually by MOCOPA®.

## What is the issue?

Currently, the questions within the SAD do not provide assurance that the Qualified Person can perform its function as defined in BSC Section L, for example, the 'front office' activities such as installation of a Metering System. The responsibility in the BSC remains on the Supplier to ensure that the appointed MOA complies with the requirements of the BSC.

At its meeting on 23 February 2017, the Performance Assurance Board (PAB) ([PAB193B](#)) raised concerns regarding whether the current MOA Qualification process provides assurance that MOAs can perform the key functions of the role as described in BSC Section J. Additionally, the PAB was concerned that Suppliers may be appointing MOAs listed on the BSC [Qualified Persons Workbook](#) without checking if they are meeting the obligations under BSC Section L.

On 16 June 2017, ELEXON subsequently held a discussion with representatives from the MOCOPA®, Distribution Connection and Use of System Agreement (DCUSA) and the Association of Meter Operators (AMO) to understand the MOA Qualification processes within each organisation, and to help find possible gaps in the assurance process for MOAs. During the discussion it became clear that there needs to be more checks between the codes to provide extra assurance within MOA Qualification. At present, it appears that various codes do not recognise each other and there is no central list of BSC Qualified and MOCOPA® Accredited MOAs. Therefore Suppliers could be appointing MOAs listed on the [Qualified Person's Workbook](#) without cross checking the [MOCOPA®'s list of Signatories](#). Additionally, there is further complexity by third party arrangements within MOCOPA®.

The discussion group therefore recommended adding a question to MOA sections of the SAD to refer to MOCOPA® Accreditation to ensure that MOAs are completing both BSC Qualification and MOCOPA® Accreditation. For the avoidance of doubt, both BSC Qualification and MOCOPA® Accreditation can be completed in parallel.

### Approved solution

[CP1498 'Updates to BSCP537 Appendix 1 'Self-Assessment Document' to incorporate an additional question for Meter Operator Agents on Meter Operation Code of Practice Agreement Accreditation'](#) was raised by ELEXON on 23 November 2017.

This CP will add the following question to sections 13.1.4, 14.1.4 and, for those CVA MOAs that intend to work on CVA Metering Equipment associated with a Boundary Point to a Distribution System or System Connection Point, section 15.1.3 of the SAD. This will ensure that MOAs complete both the BSC Qualification and MOCOPA® Accreditation processes before entering the market:

- *Are you signed up to the Meter Operation Code of Practice Agreement (MOCOPA®)?*

The following guidance will also be provided:

*The response should detail the processes and controls in place to address the following:*

- *Do you intend to use a third party agent(s) to carry out any of the functions of a MOA on your behalf, e.g. install, commission, test, maintain, rectify faults or provide a sealing service in respect of Metering Equipment? If so, and the function(s) require it, is the third party agent MOCOPA® accredited? If they are not yet MOCOPA® accredited and they should be to carry out the function they perform on your behalf, what actions and timescales do you have in place to ensure the third party agent obtains MOCOPA® accreditation? How will you ensure, where applicable to that function, that the third party agent(s) MOCOPA® accreditation status is maintained on an ongoing basis?*
- *List the third party agent(s) that you intend to use to carry out any function(s) of a MOA on your behalf. Please provide a brief description of the function each third party agent performs on your behalf and, where applicable to that function, their MOCOPA® accreditation status (e.g. N/A to the function or MOCOPA® accredited/ MOCOPA® accreditation in progress).*

The additional question is not checking or monitoring compliance within MOCOPA®; however it is in place to ensure MOCOPA® accreditation is achieved by MOAs to demonstrate they are capable of fulfilling MOA requirements under the BSC.

Please note that [CP1499 'Updates to BSCP537 Appendix 1 'Self-Assessment Document' to incorporate an additional question for Suppliers on Meter Operation Code of Practice Agreement Accreditation for Meter Operator Agents'](#) has also been raised in parallel to this CP. Similarly, this CP will ensure that Suppliers have a process in place when appointing MOAs to ensure that MOAs have completed both the BSC Qualification and MOCOPA® Accreditation processes.

### Proposer's rationale

At its meeting on 30 June 2017 the PAB ([PAB197B](#)) recommended that this CP be raised, based on the discussion group's recommendation. There is a risk to Settlement if Suppliers are appointing MOAs who are not capable of carrying out the physical aspect of the MOA role such as Meter installation and fault repairs.

The additional question will also encourage more collaboration between BSC and MOCOPA® to ensure adequate monitoring of MOAs' activities within the industry.

## Approved redlining

Attachment A contains the approved changes to BSCP537 – Appendix 1 Self Assessment Document (SAD) to deliver CP1498.

### 3 Impacts and Costs

#### Central impacts and costs

##### Central impacts

CP1498 will require changes to BSCP537 – Appendix 1 Self Assessment Document (SAD). No system changes are required for this CP and there will be no impacts on BSC Agents.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none"><li>BSCP537 – Appendix 1 Self Assessment Document (SAD)</li></ul>	<i>None</i>

##### Central costs

The central implementation costs for CP1498 will be approximately £240 (one ELEXON man day) to implement the relevant document changes.

#### BSC Party & Party Agent impacts and costs

CP1498 will impact new entrant MOAs who will need to demonstrate they have obtained MOCOPA® Accreditation. No other BSC Parties or Party Agents will be impacted.

Two of the five respondents to the CP Consultation indicated that they will be impacted by CP1498:

- One respondent commented that they anticipate a minimal impact – for example a slight increase in resource time may be required for verification of information provided.
- The other respondent noted that the CP will only impact them if and when they re-qualify as a MOA.

The remaining three respondents did not believe they would be impacted by CP1498.

All five respondents to the CP Consultation confirmed that there would be no associated costs with implementing CP1498.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
MOAs	Changes will be required to implement the solution.

## 4 Implementation Approach

### Approved Implementation Date

CP1498 will be implemented on **28 June 2018** as part of the June 2018 Release.

The June 2018 Release is the next available Release that can include this CP.

All five respondents to the CP Consultation agreed with the proposed implementation approach for CP1498.

### **PAB's initial views**

CP1498 was presented to the PAB for information at its meeting on 30 November 2017 ([PAB202/11](#)).

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

### **SVG's initial views**

CP1498 was presented to the SVG for information at its meeting on 5 December 2017 ([SVG202/05](#)).

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

### **ISG's initial views**

CP1498 was presented to the ISG for information at its meeting on 11 December 2017 ([ISG200/11](#)).

An ISG Member queried how responses received to the new question would be distributed. ELEXON advised that the responses provided in the SAD by the applicants will form part of the Qualification report presented to the PAB for consideration before they approve the application. ELEXON will verify this information on the MOCOPA® website and inform PAB if an applicant is not listed on the MOCOPA® website. ELEXON advised that MOCOPA® would use their independent website to provide more information around applicants who are going through the Accreditation process. MOCOPA® provides applicants with a provisional certificate once they have officially applied and then provide the applicant with full Accreditation once they have completed the process. Therefore MOCOPA® will publish information as to who is provisionally accredited and who is fully accredited.

The ISG 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 B.

Summary of CP1498 CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1498 proposed solution?	5	0	0	0
Do you agree that the draft redlining delivers the intent of CP1498?	5	0	0	0
Will CP1498 impact your organisation?	2	3	0	0
Will your organisation incur any costs in implementing CP1498?	0	5	0	0
Do you agree with the proposed implementation approach for CP1498?	5	0	0	0
Do you have any further comments on CP1498?	0	5	0	0

### Comments on the CP

All five respondents to the CP Consultation agreed with the proposed changes for CP1498. One respondent noted ELEXON's confirmation at the 11 December 2017 ISG meeting that they will verify the information provided by applicants in their SAD with the MOCOPA® website and that MOCOPA® will use their independent website to provide more information around applicants who are going through the Accreditation process, before approving applications. The respondent supported this collaboration in cross-checking between BSC and MOCOPA® to ensure adequate monitoring of MOAs, which in turn will provide a greater level of confidence for the Settlement process.

### Comments on the proposed redlining

No comments were received on the proposed redlined text for CP1498.

### ISG's final views

CP1498 was presented to the ISG for decision at its meeting on 20 February 2018 ([ISG202/04](#)).

An ISG Member queried whether CP1498 applies to all CVA MOAs. ELEXON confirmed that this CP only applies to CVA MOAs in relation to distribution, not transmission. Therefore, CP1498 will only apply to CVA MOAs who are working on Metering Equipment associated with a Boundary Point to a Distribution System (or System Connection Point) not directly connected to the Transmission System.

An ISG Member queried whether this CP would be applied retrospectively. ELEXON advised that the intention of the CP is to not be retrospective and would only apply to current Qualified MOAs when it re-qualifies. ELEXON also noted that the PAB's intention is to follow up with current MOAs to check that they are MOCOPA® accredited

The Chairman advised that there had been concerns from PAB members regarding the number of MOAs who had not completed both BSC Qualification and MOCOPA® Accreditation. They therefore requested that this CP be raised to add a question and provide further guidance in BSCP537 – Appendix 1 'Self Assessment Document' to help mitigate this issue.

### PAB's final views

CP1498 was presented to the PAB for decision at its meeting on 23 February 2018 ([PAB205b/09](#)).

A PAB Member queried whether MOAs have to re-qualify for MOCOPA® Accreditation. Another PAB member advised that MOCOPA® has an annual audit and so this issue would be picked up through this. If an MOA fails the audit, then they would have to re-qualify for their MOCOPA® Accreditation. Another PAB Member commented that MOCOPA® is multi-party and as such, are unable to work on distribution if they are not on the list.

### SVG's final views

CP1498 was presented to the SVG for decision at its meeting on 27 February 2018 ([SVG205/04](#)).

The SVG had no further comments to make on the CP.

### Final decision

The ISG, PAB and SVG have:

- **APPROVED** CP1498 for implementation on 28 June 2018 as part of the June 2018 BSC Systems Release.

## Appendix 1: Glossary & References

### Acronyms

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

Acronyms	
Acronym	Definition
AMO	Association of Meter Operators
BSC	Balancing and Settlement Code
BSCP	Balancing and Settlement Code Procedure
CoP	Code of Practice
CP	Change Proposal
DCUSA	Distribution Connection and Use of System Agreement
ISG	Imbalance Settlement Group ( <i>Panel Committee</i> )
MOA	Meter Operator Agent
MOCOPA®	Meter Operation Code of Practice Agreement
PAB	Performance Assurance Board ( <i>Panel Committee</i> )
SAD	Self-Assessment Document
SVG	Supplier Volume Allocation Group ( <i>Panel Committee</i> )

### 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	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>
2	BSCPs page on the ELEXON website	<a href="https://www.elexon.co.uk/bsc-and-codes/bsc-related-documents/bscps/">https://www.elexon.co.uk/bsc-and-codes/bsc-related-documents/bscps/</a>
2	MOCOPA® website	<a href="https://www.mocopa.org.uk/">https://www.mocopa.org.uk/</a>
2	PAB193B page on the ELEXON website	<a href="https://www.elexon.co.uk/meeting/pab-193b/?from_url=https://www.elexon.co.uk/events-calendar-item/pab-193b/">https://www.elexon.co.uk/meeting/pab-193b/?from_url=https://www.elexon.co.uk/events-calendar-item/pab-193b/</a>
3	Qualified Persons Workbook on the BSC website	<a href="https://www.elexon.co.uk/bsc-and-codes/bsc-signatories-qualified-persons/?signatory_id=e">https://www.elexon.co.uk/bsc-and-codes/bsc-signatories-qualified-persons/?signatory_id=e</a>
4	CP1498 page on the ELEXON website	<a href="https://www.elexon.co.uk/change-proposal/cp1498/">https://www.elexon.co.uk/change-proposal/cp1498/</a>
4	CP1499 page on the ELEXON website	<a href="https://www.elexon.co.uk/change-proposal/cp1499/">https://www.elexon.co.uk/change-proposal/cp1499/</a>
4	PAB197B page on the ELEXON website	<a href="https://www.elexon.co.uk/meeting/pab-197b/">https://www.elexon.co.uk/meeting/pab-197b/</a>

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External Links		
Page(s)	Description	URL
8	PAB202 page on the ELEXON website	<a href="https://www.elexon.co.uk/meeting/pab-202/">https://www.elexon.co.uk/meeting/pab-202/</a>
8	SVG202 page on the ELEXON website	<a href="https://www.elexon.co.uk/meeting/svg-202/">https://www.elexon.co.uk/meeting/svg-202/</a>
8	ISG200 page on the ELEXON website	<a href="https://www.elexon.co.uk/meeting/isg-200-2/">https://www.elexon.co.uk/meeting/isg-200-2/</a>
10	ISG202 page on the ELEXON website	<a href="https://www.elexon.co.uk/meeting/isg-202/">https://www.elexon.co.uk/meeting/isg-202/</a>
10	PAB205B page on the ELEXON website	<a href="https://www.elexon.co.uk/meeting/pab-205b/">https://www.elexon.co.uk/meeting/pab-205b/</a>
10	SVG204 page on the ELEXON website	<a href="https://www.elexon.co.uk/meeting/svg-205/">https://www.elexon.co.uk/meeting/svg-205/</a>