

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'

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About This Document

This document is the Change Proposal (CP) Final Report for CP1499 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 CP1499.

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 CP1499 solution.
- Attachment B contains the full responses received to the CP Consultation.

CP1499

Final CP Report

2 March 2018

Version 1.0

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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 role being sought by the applicant. The Supplier section in the SAD is split into Business Processes and Mitigating Controls. The Supplier is responsible for appointing its agents and managing the performance of its appointed agents. Section 18 (Supplier) of the SAD contains questions about how the Supplier ensures that its agents are meeting their obligation under the BSC.

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 the Supplier section of the SAD to ensure Suppliers have a process in place for checking 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

[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'](#) was raised by ELEXON on 23 November 2017.

This CP will add the following question to section 18.1.17 of the SAD to check that, when appointing MOAs, Suppliers have a process in place to ensure that MOAs have completed both the BSC Qualification and MOCOPA® Accreditation processes:

- *How will you ensure that the MOA you appoint to a Metering System is Meter Operation Code of Practice Agreement (MOCOPA®) accredited?*

The following guidance will also be provided:

The response should demonstrate details of the controls/procedures in place for the ongoing management of your agents, such as:

- *Controls to ensure that the MOA you appoint to a Metering System (or any third party agent used by that MOA to perform certain functions that require that third party agent to be MOCOPA® accredited) is MOCOPA® accredited.*
- *How will you monitor that the MOCOPA® accreditation status of the MOA you appoint to a Metering System (or any third party agent used by that MOA to perform certain functions that require that third party agent to be MOCOPA® accredited) is maintained on an ongoing basis?*

The additional question is not checking or monitoring compliance within MOCOPA®; however it is in place to ensure Suppliers appoint MOAs who have, or will have obtained, their BSC Qualification and MOCOPA® Accreditation.

Please note that [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'](#) has also been raised in parallel to this CP, to introduce an equivalent question for MOAs. Similarly, this CP will ensure that MOAs complete both the BSC Qualification and MOCOPA® Accreditation processes before entering the market.

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. Including the additional question in the SAD will provide extra assurance to the industry that Suppliers are aware that they need to check that MOAs obtain both BSC Qualification and MOCOPA® Accreditation, or have a third party arrangement in place in accordance with MOCOPA®. 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 and give Suppliers more visibility of MOAs who have obtained both the BSC Qualification and MOCOPA® full Accreditation.

Proposed redlining

Attachment A contains the approved changes to BSCP537 – Appendix 1 Self Assessment Document (SAD) to deliver CP1499.

3 Impacts and Costs

Central impacts and costs

Central impacts

CP1499 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">BSCP537 – Appendix 1 Self Assessment Document (SAD)	<i>None</i>

Central costs

The central implementation costs for CP1499 will be approximately £240 (one ELEXON man day) to implement the relevant document changes.

BSC Party & Party Agent impacts and costs

CP1499 will impact Suppliers, who will need to demonstrate they have a process in place to check that their appointed MOA is MOCOPA® accredited. It will also impact MOAs as MOAs will need to complete both BSC Qualification (and re-Qualification) and MOCOPA® Accreditation processes before entering the market. No other BSC Parties or Party Agents will be impacted.

One of the five respondents to the CP Consultation indicated that they will be impacted by CP1499:

- The 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 remaining four respondents did not believe they would be impacted by CP1499.

All five respondents to the CP Consultation confirmed that there would be no associated costs with implementing CP1499.

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

4 Implementation Approach

Approved Implementation Date

CP1499 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 CP1499.

PAB's initial views

CP1499 was presented to the PAB for information at its meeting on 30 November 2017 ([PAB202/13](#)).

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

SVG's initial views

CP1499 was presented to the SVG for information at its meeting on 5 December 2017 ([SVG202/06](#)).

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

ISG's initial views

CP1499 was presented to the ISG for information at its meeting on 11 December 2017 ([ISG200/12](#)).

An ISG Member noted that for CVA MOAs there is no relationship with a Supplier, and therefore queried whether the new question applied to CVA MOAs as well. ELEXON advised that the question would apply only to CVA Metering Systems which have a Boundary Point connected to a Distribution System, so it would depend on the CVA MOA's specific role. However, this would be reflected in the guidance note provided as part of the SAD question; if a Party Agent is using the Boundary Point connected to a Distribution System then they are required to answer the question.

An ISG Member noted that, with the increase in embedded generation that could fall into the CVA side, there would be no Supplier to ensure that the MOA is MOCOPA® Accredited. The ISG Member therefore queried whether the obligation should be shifted from the Supplier to the Registrant. Another ISG Member noted that there are an increasing number of emergent business models with more distributed generation, and it would be useful for the Registrant to receive the information. ELEXON advised that CVA Registrants do not currently fall within the scope of the SAD Qualification tests and therefore this would not currently be applicable to them.

Another ISG Member queried whether DCUSA obligates the Registrant to use a MOCOPA® Accredited agent. ELEXON noted that the DCUSA website specifies that a Registrant is required to ensure that their appointed MOAs complete MOCOPA® Accreditation. Further, a DCUSA representative was a member of the Workgroup that recommended that this CP be raised and as such agreed that this clarification was required in the SAD to provide more assurance to the market.

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 CP1499 CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1499 proposed solution?	5	0	0	0
Do you agree that the draft redlining delivers the intent of CP1499?	5	0	0	0
Will CP1499 impact your organisation?	1	4	0	0
Will your organisation incur any costs in implementing CP1499?	0	5	0	0
Do you agree with the proposed implementation approach for CP1499?	5	0	0	0
Do you have any further comments on CP1499?	0	5	0	0

Comments on the CP

All five respondents to the CP Consultation agreed with the proposed changes for CP1499. Only one respondent provided a comment noting that they fully support the proposal to ensure all Suppliers have a process in place to check BSC Qualification and MOCOPA® Accreditation of MOAs, which will mitigate against any risks to the Settlement process.

Comments on the proposed redlining

No comments were received on the proposed redlined text for CP1499.

ISG's final views

CP1499 was presented to the ISG for decision at its meeting on 20 February 2018 ([ISG202/05](#)).

An ISG Member questioned the scenario where MOAs are transferred over to a new Supplier and they answer 'no' to the question in section 18.1.17 of BSCP537 Appendix 1 'Self Assessment Document'. ELEXON advised that guidance has also been included in section 18.1.17 so that Suppliers are aware that there needs to be controls and procedures in place to ensure that they manage their Agents correctly going forward. For example, a MOA may have to disclose that they are MOCOPA® accredited or have a third party arrangement in place. The Chairman advised that this CP helps to mitigate the large numbers of 'off the shelf' Suppliers that have entered the market to ensure that they are compliant under the BSC and MOCOPA®.

An ISG Member noted that the BSC requires metering, and questioned why MOCOPA® is not brought under the governance of the BSC. ELEXON advised that MOCOPA® also covers the technical and health and safety aspects of a MOA. The Chairman noted that this is an area that is continuing to grow. Therefore, if the ISG Member would like to raise a Modification to include MOCOPA® under the BSC, then he should submit a proposal to the BSC Change team.

PAB's final views

CP1499 was presented to the PAB for decision at its meeting on 23 February 2018 ([PAB205b/10](#)).

A PAB Member queried whether the CP would apply retrospectively for Suppliers. ELEXON advised that CP1499 would not be applied retrospectively. However, as part of the implementation of the CP, it will send information to Suppliers to make them aware that as part of best practice, it is in their interest to ensure their MOAs have obtained both the BSC Qualification and MOCOPA® full Accreditation.

A PAB Member queried whether this additional question would be included in the annual BSC Audit scope. ELEXON noted that this is already carried out as part of the DCUSA audit of MOAs and therefore ELEXON would be duplicating DCUSA's work if it was to include this in ELEXON's audit scope. It therefore recommends that this is excluded from the BSC Audit scope. The PAB agreed with this recommendation.

SVG's final views

CP1499 was presented to the SVG for decision at its meeting on 27 February 2018 ([SVG205/05](#)). The SVG had no further comments to make on the CP.

Final decision

The ISG, PAB and SVG have:

- **APPROVED** CP1499 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	https://www.elexon.co.uk/bsc-and-codes/balancing-settlement-code/bsc-sections/
2	BSCPs page on the ELEXON website	https://www.elexon.co.uk/bsc-and-codes/bsc-related-documents/bscps/
2	MOCOPA® website	https://www.mocopa.org.uk/
2	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/
3	Qualified Persons Workbook on the BSC website	https://www.elexon.co.uk/bsc-and-codes/bsc-signatories-qualified-persons/?signatory_id=e
4	CP1498 page on the ELEXON website	https://www.elexon.co.uk/change-proposal/cp1498/
4	CP1499 page on the ELEXON website	https://www.elexon.co.uk/change-proposal/cp1499/
4	PAB197B page on the ELEXON website	https://www.elexon.co.uk/meeting/pab-197b/

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