Change Proposal Circular

CPC00700: Impact Assessment of CP1350 and CP1351

Responses for CP1350 'Clarifying Meter Technical Details relating to Metering Systems that can be read remotely'

Summary of Responses

Organisation	Capacity in which Organisation operates	Agree?	Impacted?	Days needed to implement
Independent Power Networks Limited	LDSO, SMRA, UMSO	Neutral	No	-
EnDCo Ltd	HH Supplier	Neutral	No	-
CE Electric UK (YEDL & NEDL)	LDSO	Yes	No	-
TMA Data Management Ltd	HHDC, HHDA, NHHDC and NHHDA	Yes	No	-
Western power Distribution	LDSO; MOA	Yes	Yes	0
Imserv	HH & NHH MOP	Yes	Yes	0
Association of Meter Operators	Trade association for Meter Operators	No	-	-
Electricity North West Limited	LDSO	Yes	Yes	0
SSE Energy Supply Limited	Supplier	Yes	No	60
Npower	Supplier & Supplier Agents	Yes	Yes	182.5

Any Questions

If you have any queries, please contact:
CCC@elexon.co.uk

Or contact:
BSCP40 Change Process Task Leader
020 7380 1435

Summary of Responses				
ScottishPower	Supplier, NHHDC, HHDC, NHHDA, HHDA, NNHMOp, HHMOp	Yes	No	-

Detailed Impact Assessment Responses			
Organisation	**Agree?**	**Impacted?**	**Comments**
Independent Power Networks Limited	Neutral	No	-
EnDCo Ltd	Neutral	No	-
CE Electric UK	Yes	No	**Lead time comment -** We are currently implementing system amendments in order to receive the new industry dataflow so no notice is required for this particular change as it does not impact us. **Associated costs comment** – None relating to this change **Do you agree that the current drafting of BSCP514 allows scope for misinterpretation as contended by CP1350? –** We are not aware of ambiguity in the description but support any changes that enhance clarity. **Do you believe that implementing CP1350 would be beneficial? What benefits or disadvantages do you believe would be associated with implementation of CP1350?** As above
TMA Data Management Ltd	Yes	No	**Do you agree that the current drafting of BSCP514 allows scope for misinterpretation as contended by CP1350? –** Yes **Do you believe that implementing CP1350 would be beneficial? What benefits or disadvantages do you believe would be associated with implementation of CP1350?** Clarification on the use of a new data flow is always welcome to promote uniformity within the industry.
Western power Distribution	Yes	Yes	**For which role is your organisation impacted?** MOA **Please state what the impact is** – It just confirms the expected impact of introducing the new flow. **Lead time comment -** System can already accommodate this **Would implementation in the proposed Release have an adverse impact on your**

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			organisation? No **Do you agree that the current drafting of BSCP514 allows scope for misinterpretation as contended by CP1350? –** It obviously does allow scope for misinterpretation as the party raising this CP would not otherwise have raised it. **Do you believe that implementing CP1350 would be beneficial? What benefits or disadvantages do you believe would be associated with implementation of CP1350?** It will be beneficial if it removes the scope for misinterpretation.
Imserv	Yes	Yes	**Agree change comment –** I don't believe the proposed amendment changes IMServ understanding of the D0313 flow and the obligations on the Meter Operator but the additional sentence does make it clearer in BSCP514. **For which role is your organisation impacted?** MOP **Please state what the impact is** – BSCP Guidelines **Lead time comment -** No notice required **Would implementation in the proposed Release have an adverse impact on your organisation?** No **Do you agree that the current drafting of BSCP514 allows scope for misinterpretation as contended by CP1350? –** No. We believe the existing BSCP514 text contained the necessary information within the brackets below.... *For Metering Systems that can be read remotely, this also includes all appropriate information required by the NHHDC to retrieve data from the Metering System remotely (and, where appropriate, required by the Meter Operator Agent to configure the Metering System remotely). This may include, but is not limited to, the communications and security details of the Metering System and the Code of Practice of the Metering System installed.* *For any D0313 sent from one Meter Operator Agent to another Meter Operator Agent this must include, but is not limited to, all communications, security and password details required to fully access all remote functions of the Metering System.* **Do you believe that implementing CP1350 would be beneficial? What benefits or disadvantages do you believe would be associated with implementation of CP1350?** Small benefit
Association of Meter Operators	No	-	**Agree change comment –** The current wording to sufficient and clear. **Any other comments** - It should be recognised that in developing the CoP10 and associated data

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			flows it has always been recognised that an old MO will only pass MTD to a 'new MO' when there is an appropriate commercial relationship between the two MOs. For example, the old MO will only pass on the details for the installed communication equipment where the new MO has agreed to the transfer of the communication contract. This consistent with the approach adopted in the HH market since 1998.
Electricity North West Limited	Yes	Yes	**For which role is your organisation impacted?** Distributor **Please state what the impact is** – A system/process to capture the D0313 data. **Lead time comment -** We will be ready for this change in line with the proposed industry implementation of Nov-11. **Would implementation in the proposed Release have an adverse impact on your organisation?** The implementation will not have an adverse impact on our organisation. **Associated costs comment** – There will be no further associated costs to implement this change. **Do you agree that the current drafting of BSCP514 allows scope for misinterpretation as contended by CP1350? –** BSCP514 does not allow scope for misinterpretation. **Do you believe that implementing CP1350 would be beneficial? What benefits or disadvantages do you believe would be associated with implementation of CP1350?** I believe this would be beneficial.
SSE Energy Supply Limited	Yes	No	**Would implementation in the proposed Release have an adverse impact on your organisation?** No **Associated costs comment** – Minimal cost **Do you agree that the current drafting of BSCP514 allows scope for misinterpretation as contended by CP1350? –** Yes **Do you believe that implementing CP1350 would be beneficial? What benefits or disadvantages do you believe would be associated with implementation of CP1350?** Yes it would be beneficial. It makes it clearer. **Any other comments** - With regards to the proposed solution we agree with bullet points 1 & 3. Bullet point 2 – DTC flow has enough info to it clear which data items are mandatory.
Npower	Yes	Yes	**For which role is your organisation impacted?** Supplier, NHHDC and Meter Operator. **Please state what the impact is** – We will be sending and receiving the proposed new flow and are therefore impacted. **Lead time comment -** Any change we implement would need to have an absolute minimum of a

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			six month lead time for implementation. **Would implementation in the proposed Release have an adverse impact on your organisation?** Resource and costs to implement. **Associated costs comment** – Currently these are not available. **Do you agree that the current drafting of BSCP514 allows scope for misinterpretation as contended by CP1350?** – Yes **Do you believe that implementing CP1350 would be beneficial? What benefits or disadvantages do you believe would be associated with implementation of CP1350?** Yes
ScottishPower	Yes	No	-

About Severity Codes

H (High):
Prejudices document's conclusions, recommendations or fitness for purpose.

M (Medium):
Matter of substance, but not high.

L (Low):
Minor error but document's intention is clear.

Comments on the redline text					
No.	**Organisation**	**Document name**	**Location**	**Severity Code**	**Comments**
1	Imserv	BSCP514	1.1	L	Removal of duplication in bracketed sentence... For Metering Systems that can be read remotely, this also includes all appropriate information required by the NHHDC to retrieve data from the Metering System remotely (and, where appropriate, required by the Meter Operator Agent to configure the Metering System remotely). This may include, but is not limited to, the communications and security details of the Metering System and the Code of Practice of the Metering System installed.

Responses for CP1351 'Improving Half Hourly Metering Equipment commissioning and storage of associated commissioning data'

Summary of Responses

Organisation	Capacity in which Organisation operates	Agree?	Impacted?	Days needed to implement
Independent Power Networks Limited	LDSO, SMRA, UMSO	Yes	No	-
EnDCo Ltd	HH Supplier	Neutral	No	-
CE Electric UK (YEDL & NEDL)	LDSO	Yes	Yes	0
TMA Data Management Ltd	HHDC, HHDA, NHHDC and NHHDA	Yes	Yes	90
EDF Energy Nuclear Generation Limited	Generator and CVA MOA	Yes and No	Yes	90
Western power Distribution	LDSO; MOA	No	Yes	90
Imserv	HH & NHH MOP	Neutral	Yes	365
Association of Meter Operators	Trade association for Meter Operators	No	Yes	-
Electricity North West Limited	LDSO	Yes in principle	Yes	180
SSE Energy Supply Limited	Supplier	Yes	No	90
Npower	Supplier & Supplier Agents	Yes	Yes	-
ScottishPower	Supplier, NHHDC, HHDC, NHHDA, HHDA, NNHMOp, HHMOp	No	Yes	180

Detailed Impact Assessment Responses

Organisation	Agree?	Impacted?	Comments
Independent Power	Yes	No	-

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Networks Limited			
EnDCo Ltd	Neutral	No	-
CE Electric UK	Yes	Yes	**Agree change comment –** We think that this proposal will make settlements more accurate by reducing the occurrence of inaccuracy within Half Hourly metering systems. **For which role is your organisation impacted?** Licensed Distribution System Operator **Please state what the impact is** – Given the vast amount of energy used in Half Hourly metering systems, there is significant scope for inaccuracy in settlement if some of these systems are not correctly commissioned. With inaccuracy in settlements, we as a distributor may not have a true understanding of the losses on our system. This could have a financial impact on LDSOs since an incentive to reduce losses is included in our price control mechanisms. **Lead time comment -** We do not need much notice to implement this change proposal and we are happy with the proposed implementation date of 23 February, which is in line with the February 2012 BSC release. **Would implementation in the proposed Release have an adverse impact on your organisation?** No adverse impacts anticipated. **Associated costs comment** – The only costs would be administrative costs associated with monitoring any processes involving interaction with meter operators. **Do you believe that implementing the changes to commissioning and proving proposed by CP1351 would be beneficial? What do you believe are the benefits or disadvantages?** For larger half-hourly sites in particular, the potential for error in recording the electricity consumed is significant if meter commissioning does not take place after changes to metering equipment on existing sites. By implementing this change and ensuring that commissioning and proving takes places at existing sites with metering system changes as well as at new sites, the accuracy of settlement data will increase due to reduced errors. This is further improved by ensuring that commissioning is "end to end" where possible and not just testing of the item that has been changed. The Meter Operator Agent is already on site if a meter is installed on a new site or metering equipment is being changed at an existing site, so it makes sense that a full commissioning test takes place during the same visit, thereby minimising costs. Implementing CP1351 removes any ambiguity with regards to meter commissioning and makes the requirements clearer to all parties involved. We do not think that there are any

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			disadvantages to implementing the changes. **Do you believe that introducing monitoring and reporting by BSCCo as proposed by CP1351 would be beneficial? What do you believe are the benefits or disadvantages?** It would be beneficial because it would be a significant improvement on the current arrangements for the storage and retrieval of commissioning data. Currently, commissioning records are not stored centrally and recent TAA checks have identified that a number of commissioning records have been unavailable. Obligating Meter Operator Agents to send a copy of each commissioning record to the BSCC would, for example, allow a feedback loop to be created to monitor if metering systems on new connections had actually been commissioned. The BSCCo have acknowledged that the cost of this monitoring is not high so we cannot see any disadvantages of doing so.
TMA Data Management Ltd	Yes	Yes	**For which role is your organisation impacted?** HHDC **Please state what the impact is** – System and procedure **Would implementation in the proposed Release have an adverse impact on your organisation?** Not if the CP is accepted within 90 days of the planned release **Associated costs comment** – Medium cost **Do you believe that implementing the changes to commissioning and proving proposed by CP1351 would be beneficial? What do you believe are the benefits or disadvantages?** We believe that the implementation of CP1351 would be beneficial for the industry as a whole. It would ensure that discrepancies between CT and VT ratios for example are picked and corrected on site before data in settlement is affected saving time, effort and money for MOA's Suppliers, Supplier Agents and potentially reducing the numbers of Trading Disputes. Often these issues affect very large sites and therefore have a significant impact on settlement. **Do you believe that introducing monitoring and reporting by BSCCo as proposed by CP1351 would be beneficial? What do you believe are the benefits or disadvantages?** The benefits would be as described above. **Any other comments** - Could CP1351 be updated with a clarification on what would constitute work on the electrical connections on a sites in terms of D0268 items change in order to ensure that HHDC's as well as MOA can pick up the additional requirement for Proving Tests?
EDF Energy Nuclear	Yes and no	Yes	**Agree change comment –** Any improvements to the recording and retention of

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Generation Limited			commissioning records is to be welcomed. Providing a copy of such records to BSCCo would be beneficial in order to ascertain the adequacy of such records so that any deficiencies might be rectified close to time of actual commissioning. However, I do believe the obligation to retain records should remain with the MOA alone; placing the same requirement on BSCCo or its agent, which will never complete, weakens the obligation on MOAs. NSCCo or its agent may choose to retain copies of the commissioning records, but this is should be their choice and not a BSC or CoP requirement. Requiring MOAs to carry out full end-to-end commissioning on an MSID whenever a change occurs is impracticable for a Generator. To carry out such a test on a single MSID that includes all meters, outstations and instrument transformers for the power station would not only be a very lengthy and costly process but could not be completed whilst on load. Whilst this may be feasible for a supply site, it is not for a generating station and cannot be justified on equipment that has not been changed. The proposed drafting of CoP4 makes no distinction on the type of site. CoP4 suggest a proving test is required if there has been any change to the metering system. As a Proving test is to verify instation retrieves data matching that in the outstation, a Proving Test is unnecessary unless there has been a change of outstation or change to channel allocations. **For which role is your organisation impacted?** Generator and CVA MOA **Please state what the impact is** – Full end-to-end commissioning tests could not be carried out and would not be justified on partial replacement of metering equipment. Large scale changes would only take place during outages and might enable full end-to end testing on affected circuits, but not on the entire MSID. I have reservations on providing commissioning records for permanent storage by BSCCo or its agent. As a nuclear generator, this may have repercussions on BSCCo for nuclear security and require their systems to be vetted and approved by OCNS. Any change to BSCCO agent change might need to be approved by ourselves if this included transfer of any records held by the agent and covered under OCNS arrangements. **Would implementation in the proposed Release have an adverse impact on your organisation?** Significant increase in metering costs if full end-to-end commissioning required on minor changes to metering equipment, which may not be feasible if plant outages also

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			required. **Associated costs comment** – Full end-to-end commissioning tests likely to increase metering costs tenfold on a minor change only in addition to costs of lost generation should an additional outage be required exclusively for such tests. **Do you believe that implementing the changes to commissioning and proving proposed by CP1351 would be beneficial? What do you believe are the benefits or disadvantages?** Obligation to retain commissioning records rests with MOA; requiring BSCCo to retained records in addition to MOA dilutes MOA responsibility. Inspection of records by BSCCo or its agent soon after commissioning would be beneficial to ensure their adequacy and enable rectification at the appropriate time. Full end-to-end commissioning tests are not feasible in all cases. CoP4 should specify more clearly circumstances where this should be carried out; currently drafting implies mandatory in all cases. Proving tests compare data in outstation (MSID) and instation (CDCA or DC). If there has been no disturbance to the communication links of the outstation a proving test is unnecessary unless there has been a change of channel allocation. **Do you believe that introducing monitoring and reporting by BSCCo as proposed by CP1351 would be beneficial? What do you believe are the benefits or disadvantages?** Lack of any or adequate commissioning records is a known issue, due in part to changes to requirements of CoP4 since initial commissioning. BSCCo inspecting commissioning records soon after sites have been commissioned should improve the quality of such records.
Western power Distribution	No	Yes	**Agree change comment –** The proposed changes to 5.5, 5.5.2, 5.5.4 and 5.6 are wrong in referring to changes to metering equipment - communications equipment are part of the "Metering Equipment" and it is not appropriate for the whole metering system to be recommissioned if we change a modem or SIM card. The requirement only needs to apply when there are material changes. See detailed comments. Regarding the sending and retention of commissioning records to the BSCCo: Before we take such a large step and create another administrative goliath there are other things we should consider. It is right there needs to be visibility on whether metering systems are commissioned but if we have to submit (and have checked) commissioning paperwork to a

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			TAA like party we will be forever lost in the minutia of test certificates, limits of error for prevailing load tests, different commissioning practices, queries over site with insufficient load to test etc. A good start would be to include the Date Commissioned in the D0268 flow - at the moment we received MTDs from another MOP and we do not know whether the meter was commissioned (and now that a previous change to the BSCP tied commissioning with proving tests whether it has been proved too). All meter operators have a Date Commissioned field in their systems (they need this to correctly trigger proving tests) - we just can't communicate this data to other parties. Elexon could request this information from MOPs anyhow and it does get tested by the BSC auditor. **For which role is your organisation impacted?** MOA **Please state what the impact is** – Additional resources needed to support this new process. **Would implementation in the proposed Release have an adverse impact on your organisation?** No **Associated costs comment** – estimated £5,000 **Do you believe that implementing the changes to commissioning and proving proposed by CP1351 would be beneficial? What do you believe are the benefits or disadvantages?** We fully support the principle of the CP, subject to it clarifying the principle that tests need to be carried out whenever there is a material change to a metering system. We don't support the concept of holding certificates centrally as it is unnecessary administrative burden. **Do you believe that introducing monitoring and reporting by BSCCo as proposed by CP1351 would be beneficial? What do you believe are the benefits or disadvantages?** No. It will just increase the focus on documentation rather than ensuring that the maximum number of metering systems are installed correctly with the correct CT and VT ratios. **Any other comments** - We are supportive of the aim of this CP but we just do not support the sending of the certificates to BSCCo. We think this is likely to result in the focus being placed on paperwork rather than on the fundamental problem of ensuring that meters are installed correctly.
Imserv	Neutral	Yes	**Agree change comment –** We agree there is room for improvement in the HH

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			commissioning process and are happy to support any changes which makes this possible, however we are also keen not to overly complicate the process. **For which role is your organisation impacted?** MOP **Please state what the impact is** – Full scope is unknown at this point but we believe that changes to system functionality and additional office resource may be required to manage the proposed process. **Lead time comment -** Time scales will be dependent on the scope of the changes i.e. Software development required. Please also consider that recently there have been a large number of MOP changes proposed/implemented, most significantly the new NHH D0313 flow which will go live in November 2011. Resource to develop and implement for these other changes need be considered. **Would implementation in the proposed Release have an adverse impact on your organisation?** The full impact unknown at this point but we expect the requirement to provide Commissioning records to BSCCo will involve additional manual intervention. The documentation doesn't explain what format will be used to transfer commissioning records to the BSCCo so we are unable to comment how this might impact Imserv. **Associated costs comment** – Unknown **Do you believe that implementing the changes to commissioning and proving proposed by CP1351 would be beneficial? What do you believe are the benefits or disadvantages?** Additional monitoring and reporting in itself won't improve the accuracy of meter programming (matching the physical CT/VT ratios with the ratios programmed into the meter) but it may increase awareness and as a result have a positive impact. Consideration should be given to physical onsite issues which may affect accuracy i.e. access to CT labels & availability of accurate information from DNO. **Do you believe that introducing monitoring and reporting by BSCCo as proposed by CP1351 would be beneficial? What do you believe are the benefits or disadvantages?** As above
Association of Meter Operators	No	Yes	**Agree change comment –** Not as drafted. Whilst fully support the desire to improve the processes surrounding commissioning the TAMEG workshop in July highlighted several areas that need further consideration. A more fully worked through solution should be developed by TAMEG reviewing CoP4 (and related documents, incl BSCP 502 & 514) so that TAMEG can

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			jointly develop a proposed CP. There are thought to be other changes required in addition to this proposal. For example the provision of SVA VT/CT equipment is by Distribution Businesses, it may be appropriate for CoP4 to include a "CT/VT commissioning sheet" which is passed to the MO giving the MO all the relevant details necessary to complete the 'overall commissioning'. This is an aspect debated at the TAMEG workshop in July, but has not been able to be further developed at this time. It may be that this leads proposed changes to BSP515 – Licensed Distribution. The proposal suggests text for BSCP514: "Where any change is made to, or the MOA carries out work on, the electrical connections of existing Metering Equipment." A number of problems have occurred where Distribution Businesses (not MO) have changed CT/VT connections without leading to recommissioning. So a similar trigger event may be required in BSCP 515. SVG and the raiser are asked to 'hold', this change to enable TAMEG to continue its work to review and develop a proposal with more stakeholder engagement. **For which role is your organisation impacted?** Meter Operators **Please state what the impact is –** The proposed change potentially changes the obligations associated with commissioning **Would implementation in the proposed Release have an adverse impact on your organisation?** Yes. These changes may not be sufficient or appropriate. If this change is progressed it may lead to a further subsequent consequential changes, wasting effort by all stakeholders **Do you believe that implementing the changes to commissioning and proving proposed by CP1351 would be beneficial? What do you believe are the benefits or disadvantages?** Not as drafted **Do you believe that introducing monitoring and reporting by BSCCo as proposed by CP1351 would be beneficial? What do you believe are the benefits or disadvantages?** Require further consideration, definition and cost/benefit consideration
Electricity North West Limited	Yes in principle	Yes	**For which role is your organisation impacted?** Distributor **Please state what the impact is** – Capturing and updating the data. **Would implementation in the proposed Release have an adverse impact on your organisation?** Implementation in the proposed Release would not have an adverse impact on our organisation.

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			Do you believe that implementing the changes to commissioning and proving proposed by CP1351 would be beneficial? What do you believe are the benefits or disadvantages? This would be beneficial and good industry practice. **Do you believe that introducing monitoring and reporting by BSCCo as proposed by CP1351 would be beneficial? What do you believe are the benefits or disadvantages?** The introduction of additional monitoring may be too onerous.
SSE Energy Supply Limited	Yes	No	**-**
Npower	Yes	Yes	**For which role is your organisation impacted?** Meter Operator **Please state what the impact is** – It will impact our current processes for commissioning. **Lead time comment -** We would normally expect changes to be implemented with a minimum six month lead time. **Associated costs comment** – Currently not available. **Do you agree that the current drafting of BSCP514 allows scope for misinterpretation as contended by CP1350? –** Potentially. **Do you believe that implementing CP1350 would be beneficial? What benefits or disadvantages do you believe would be associated with implementation of CP1350?** Yes **Any other comments** - re CoP4: Section 5.5.2 Redline statement: 'Where individual items of Metering Equipment are to be replaced or reconnected the whole Metering System is required to be Commissioned by the Meter Operator Agent on behalf of the Registrant.' This appears to remove any responsibility from the DNO for the commissioning of altered metering systems which differs from the outputs of the TAMEG Working Group that concluded DNOs should have a requirement to provide MOAs with a copy of a commission for the primary plant (CTs, VT etc...) but that ultimately overall responsibility would remain with the MOA to attempt an end to end commission. The TAMEG discussion extended to injection testing of newly installed transformers by DNOs and the results of this being made available to MOAs. We feel that this statement would simply lead to MOAs being unable to fully commission metering due to the same problems industry already experiences.

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			Section 5.5.4 Carrying on from the earlier point, it would be beneficial for DNOs to provide primary commissioning to BSCCo in the same manner as MOA is to provide commissioning. We see it as unrealistic to expect that an MOA will be able to complete commissioning in all instances and the addition of well documented DNO testing would help improve one of the weaker areas of commissioning (MOAs not being able to access or commission transformers using primary reads). I have attached a copy of the notes from a TAMEG workshop held on 14/07/2011 which in our opinion indicates that there should be more of a divide between MOA and DNO responsibilities with the BSC and Code Subsidiary Documents placing more of an emphasis on the DNOs involvement in an end to end commissioning procedure. We do not believe that this CP supports that.
ScottishPower	No	Yes	**Agree change comment –** We reject this change awaiting clarification regarding our comments in Question 8 below. **For which role is your organisation impacted?** HHMOp **Please state what the impact is** – Significant system and process changes **Would implementation in the proposed Release have an adverse impact on your organisation?** Yes – we would strongly recommend that implementation be pushed back to the June 2012 release. **Any other comments** – **Definition of "Significant Work"** The CP recommends that "new metering equipment" means "metering equipment on new sites" and "changes to metering equipment on existing sites" and later on in the document claims that "The solution would be mandatory only for new sites and sites with metering that is subject to significant work". A definition would be required for the term "significant work". Would the term "significant work" for example include replacement of meters due to change of MO agent or only where there was a change of CTs / VTs or primary plant? **End to end commissioning testing on existing sites**

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			At present ownership of the CTs and VTs on site lies with the DNO. The meter operator relies on the DNO to provide details of the CT / VT ratios installed via a D0215. This information should ideally be backed up with evidence of tests carried out on the CTs and VTs to prove both ratio and orientation of the CTs and VTs, however in a number of cases, especially out of area this information is not provided. If the scope of commissioning was to be changed to "full end to end testing" it would suggest that the MO would need to confirm CT ratios possibly by primary injection testing, especially on HV sites. This is not always possible on new sites as the MO may not be authorised to work on the DNO equipment and relies on the information being provided by the DNO. Where metering equipment is changed on HV sites the MO would rely on the DNO to arrange a supply outage in order that the necessary tests could be carried out. This would require an outage to be arranged which would involve costs for the DNO, the MO along with potential cost and inconvenience to the customer. There are also implications for LV sites where it is not always possible to confirm primary load on site due to safety issues. (example of this would be accessing CTs on live LV busbars). Details of commissioning can be found in Elexon's COP 4 guidance notes on the following link http://www.elexon.co.uk/ELEXON%20Documents/Code%20of%20Practice%204.pdf (pages 1 – 6). **Records** The CP proposes that records would be held by the BSCCo. A lot of the information held by MOs is on paper copy, for example CT / VT test certificates, ratio test results and site paperwork. How would this information be transferred to the BSCCo. Would this involve MOs having to scan / photocopy all relevant information and then forward this to the BSCCo? If this was the case there would be significant additional admin costs for the MO.

About Severity Codes

H (High):
Prejudices document's conclusions, recommendations or fitness for purpose.

M (Medium):
Matter of substance, but not high.

L (Low):
Minor error but document's intention is clear.

Comments on the redline text					
No.	**Organisation**	**Document name**	**Location**	**Severity Code**	**Comments**
1	TMA Data Management Ltd	BSCP514	8.3.1, last item	M	Clarification required on which items of a D0268 would be affected by any change made to, or the MOA carries out work on, the electrical connections of existing Metering Equipment
2	TMA Data Management Ltd	BSCP502	4.6.1, last item	M	As above
3	EDF Energy Nuclear Generation Limited	CoP4	5.5.4	H	Requirement to carry out commissioning, specified as full end-to-end tests in CP, does not take into account practicability or cost of carrying out such test at a large generating station. This requirement should be qualified by referring to the type of sites where this should be mandatory and other optional.
4	EDF Energy Nuclear Generation Limited	CoP4	5.6	L	A Proving Test following partial replacement of a metering system is unnecessary where the outstation or its configuration has not been changed.
5	Western Power Distribution	COP 4	Part 5.5	-	Suggested rewording for 2nd paragraph under commissioning. Commissioning shall be performed on all new Metering Equipment which is to provide metering data for Settlement, and on any existing Metering Equipment in which the metering current or voltage circuits replaced or reconnected. (note :- work on correctly fused auxilliary circuits for the purposes of providing communication functions that do not affect the accuracy of the meter can be worked on without the requirement to re-commission the Metering System).
6	Western Power Distribution	COP 4	Part 5.52	-	Suggested rewording for final paragraph Where individual items of Metering Equipment are replaced or reconnected the whole Metering System is required to be Commissioned by the Meter Operator Agent on behalf of the Registrant. (note :- work on correctly fused auxilliary circuits for the purposes of providing communication functions that do not affect the accuracy of the meter can be worked on without the requirement to re-commission the Metering System).

Comments on the redline text					
7	Western Power Distribution	COP 4	Part 5.6	-	Suggested rewording In order to ensure that the metering data recorded by the Metering Systems Outstation(s) can be transferred to Settlements, a Proving Test shall be carried out on all new Metering Systems and where any change is made to, or work takes place on, the electrical connections of existing Metering Equipment in accordance with BSCP514 or BSCP02 as appropriate. (note :- work on correctly fused auxilliary circuits for the purposes of providing communication functions that do not affect the accuracy of the meter can be worked on without the requirement of a Proving Test of the Metering System).
8	Imserv	CoP 4	5.5.4 Records	H	When providing details of commissioning records what format is to be used i.e. Data flow/Excel/Word form?
9	Imserv	CoP 4	5.5.4 Records	H	How frequently will commissioning records be sent to the BSCCo i.e. daily, weekly or monthly?
10	Imserv	CoP 4	5.5.4 Records	H	In this paragraph it says the MOP must sent a copy to the BSCCo, it also say commissioning records must be provided on request, in what circumstances will the BSCCo make this request? Where new Metering Equipment is installed, including changes to existing Metering Equipment, the Commissioning record shall be retained by the MOA and a copy provided to BSCCo. **A copy of any Commissioning record shall be provided to BSCCo on request.**
11	Imserv	CoP 4	5.5.2	H	Believe we need a definition as to what items are considered Metering Equipment i.e. are Modems, Sim cards, antennas to be considered as Metering Equipment? Where individual items of Metering Equipment are to be replaced or reconnected the whole Metering System is required to be Commissioned by the Meter Operator Agent on behalf of the Registrant. then only those items are required to be Commissioned. For clarification, Metering Systems in their entirety need not be re-Commissioned when items are replaced within that

Comments on the redline text					
					system.
12	Association of Meter Operators	BSCP514	-	H	Several messages indicating 'error bookmark not defined'
13	Association of Meter Operators	BSCP514	8.3.1	H	The proposed new clause: "Where any change is made to, or the MOA carries out work on, the electrical connections of existing Metering Equipment." May need to be changed to read ...MOA or Distributor...
14	Npower	CoP4	Section 5.5	-	CoP4 Redline text states: 'and on any existing Metering Equipment in which individual items of Metering Equipment are replaced or reconnected.' We would suggest this should read: 'and on any existing Metering System in which individual items of Metering Equipment are replaced or reconnected.'

About Severity Codes

H (High):
Prejudices document's conclusions, recommendations or fitness for purpose.

M (Medium):
Matter of substance, but not high.

L (Low):
Minor error but document's intention is clear.