Panel 151/10

Meeting name	BSC Panel
Date of meeting	15 January 2009
Paper title	Decision on CP1260 - Meter Investigation Process where a Site is Capable of Exporting (microgeneration)
Purpose of paper	For Decision
Synopsis	ELEXON presented CP1260 'Meter Investigation Process where a Site is Capable of Exporting (microgeneration)' to the SVG in November and December 2008 for decision. The SVG failed to reach a unanimous decision on the outcome of the CP on both occasions. This was due to differing views on the data flow to be used in the meter investigation process. This paper recommends that the Panel approve CP1260.

1 Introduction

1.1 In August 2007 the Panel asked ELEXON to raise a BSCP40 issue to consider whether improvements were possible to the microgeneration[1] processes described in the BSCPs. ELEXON raised issue 2 in August 2008.

1.2 BSCP40 issue 2 was further progressed as Draft Change Proposal (DCP) 0030 and later split into Change Proposals 1259 and 1260.

1.3 The SVG approved CP1259 in November 2008, but have been unable to make a unanimous decision on CP1260.

2 BSCP40 issue 2

2.1 SVG agreed to set up a Working Group, this Group met twice and made a number of recommendations which the SVG agreed (SVG 85/03). These recommendations were to:

- Publish a microgeneration guidance note on the ELEXON website (now complete);
- Raise a Draft Change Proposal containing the proposed changes to Licensed Distribution System Operator (LDSO) obligations and meter investigation processes;
- Close BSCP40 issue 2; and
- Note that changes to the D0168[2] flow and SSTGP Limit[1] would be progressed separately under the MRA and by ELEXON respectively.

3 DCP0030

3.1 ELEXON raised DCP0030 on behalf of the issue 2 working group, on 04 July 2008.

3.2 The aim of DCP0030 was to put in place consistent processes for LDSOs, Suppliers and Meter Operators to follow, where it is identified that a site can Export Energy; this is to make sure that the Import Meter is still working accurately.

3.3 DCP0030 suggested a 2 part process:

[1] Microgeneration is known as Small Scale Third Party Plant Generation (SSTPG) under the BSC.
[2] Request for Additional / New MPAN Core (s)

a) A notification from the LDSO to the Supplier to highlight where a site is capable of Exporting Energy. This has been addressed by CP1259 and approved by the SVG (see Appendix B); and

b) A meter investigation process for Suppliers to check with the Meter Operator to confirm that the Meter will not run backwards where a site is capable of Exporting Energy. This is the change that is addressed by CP1260. This aligns with the BSC Obligation in **Section K1.2.1 where Suppliers must ensure that their Meters can accurately record Import Energy separate from any Export.**

3.4 Both processes (a and b) involve the use of data flows. A data flow is an electronic text file containing specific instructions to relevant BSC Parties and Party Agents. For example, a Supplier can send a data flow to a Meter Operator requesting that they install a new Meter. These data flows have the following format Dxxxx, e.g. D0001, D0142.

3.5 **This paper only focuses on the meter investigation process (b)**.

3.6 We asked Meter Operators and Suppliers which data flows should be used in the meter investigation process (i.e. a D0001[3], D0002[4], D0005[5] or other data flows).

3.7 Based on feedback received during DCP0030 version 1.0, ELEXON issued DCP version 2.0 which included the following options for the meter investigation process where a Supplier was informed that a site can Export Energy:

- **OPTION 1:** The **original** issue 2 Working Group solution (identical to that presented in DCP version 1.0). This solution is a two stage meter investigation solution where the Supplier would initially request the Meter Operator to conduct a meter investigation. Based on the findings the Supplier would send an order for the Meter Operator to replace the meter, if it was required (see Appendix A for further details);

However, a number of respondents suggested the above solution would be too long and complicated. As a result 2 'shorter' solutions were provided at the time; a respondent to the first consultation suggested Option 2, and Option 3 was developed by ELEXON.

- **OPTION 2:** A shortened – one cycle solution, which used the **D0142**[6] to notify the Meter Operator to investigate the meter. A D0142 is a data flow used where a Supplier wants the Meter Operator to replace the meter, regardless of the condition of the meter. Therefore, this may not be classed as an investigative process; and

- **OPTION 3:** A shortened – one cycle solution, which used the **D0001** to notify the Meter Operator to investigate the meter. The D0001 is an instruction for investigation. On receiving a D0001, the Meter Operator would investigate whether the Meter can accurately capture Import Energy. If the Meter Operator felt that the Meter required replacement, he could do so, and then inform the Supplier that this has occurred.

When the industry impact assessment for DCP0030 v2.0 was issued, we included a question specifically asking respondents for their preferred meter investigation solution.

3.8 The majority of DCP0030 v2.0 consultation respondents preferred **option 3** (7 preferred option 3, 1 preferred option 1, 1 preferred option 2, and the remaining 5 did not choose an option). As a result, option 3 was included as the proposed solution in CP1260.

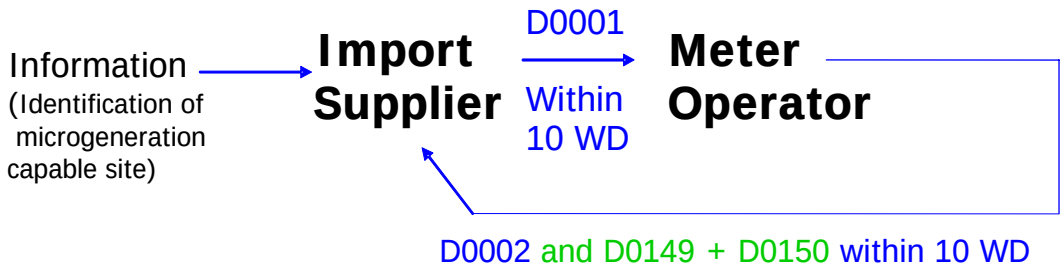
[3] D0001 'Request Metering System Investigation'
[4] D0002 'Fault Resolution Report or Request for Decision on Further Action'
[5] D0005 'Instruction on Action'
[6] D0142 'Request for Installation or Change to a Metering System Functionality or the Removal of All Meters'

3.9 This solution still has majority support from industry. Tables showing more detailed industry responses from the CP1260 and DCP0030 impact assessments have been included in Appendix A.

4 CP1260

4.1 Solution

4.1.1 CP1260 aims to put in place a process for the Import Supplier to investigate whether the Import meter accurately records Import Energy separately from any Export Energy. CP1260 is based on Option 3 from DCP0030 as shown in the diagram below:



- On receipt of information that a site is microgeneration capable, the Import Supplier requests the Meter Operator carry out a Metering System investigation via a D0001 flow. The Meter Operator is required to confirm if the meter can accurately record Import Energy;

- There are two possible outcomes from this Meter investigation. Where the Meter can already accurately record Import Energy, the Meter Operator responds with a D0002. The D0002 will include confirmation that the Meter can accurately record Import Energy; and

- Where a Meter cannot accurately record Import Energy, the Meter Operator responds with a D0002 confirming a Meter replacement. The Meter Operator will then send a D0149[7] and D0150[8] flows when they have replaced the Meter.

4.1.2 Respondents by significant majority[9] supported the solution proposed by CP1260. Please refer to Appendix A for further details of the responses received.

4.2 Implementation

4.2.1 After the SVG meeting in December, ELEXON contacted the respondents to the CP1260 impact assessment:

- The majority of respondents (14 out of 16) indicated that they can still meet the timescales associated with CP1260, if it were to be included in a June 2009 release;

- One respondent indicated that they agree to the implementation date but are not directly impacted by the implementation of CP1260; and

[7] D0149 'Notification of Mapping Details'
[8] D0150 'Non Half Hourly Meter Technical Details'
[9] 11 of 16 respondents supported the solution. One respondent disagreed but would support the CP if the corresponding MRA CP was approved.

- One respondent indicated a lead time of 9 months, as amendments were required to their systems, in order to implement the CP1260 solution. This would mean that CP1260 would be included in the November 2009 release.

4.3 Costs

4.3.1 The estimated cost to implement CP1260 in the June 2009 Release is £660 (3 ELEXON man days).

4.3.2 For those Suppliers and Supplier Agents that do not use the D0001 data flow, there will be costs associated with amending their systems and processes to implement the CP1260 solution. No specific costs were provided during the CP1260 impact assessment.

5 SVG Discussion - November

5.1 The SVG failed to reach a unanimous decision on whether or not to approve CP1260. This was due to strong differing views on which data flow the Supplier should use to notify the Meter Operator that a meter investigation is required.

5.2 After the November SVG meeting, ELEXON scheduled a workshop to discuss the pros and cons of using different data flows.

5.3 Based on feedback received from SVG members:

- ELEXON believed that a consensus would not have been attainable and so cancelled the workshop; and
- Recommended to the SVG that CP1260 be withdrawn.

5.4 One 'would be attendee' expressed their disappointment that the CP was recommended for withdrawal as they believed that CP1260 had clear benefits.

6 SVG Discussion - December

6.1 The SVG were unable to reach a unanimous decision on whether to approve or reject CP1260 again. The SVG were polarised between the D0001 and D0142 data flows, for use between the Supplier and Meter Operator. The D0005 was suggested as another alternative.

6.2 Despite the disagreement on the appropriate data flow, **the SVG unanimously agree that a common industry wide solution is required**, particularly as microgeneration will increase over the next few years.

6.3 The majority of SVG members (5 out of 9) believed that the D0001 solution was the correct solution, whereas other SVG members believed that the D0142 solution was more appropriate. The views of the SVG members have been recorded in the table below:

Views for the D0001 solution	Views for the D0142 solution
• The appropriate data flow to use in the solution was debated by an Expert Group, consulted with industry and the D0001 has majority support from industry; • One SVG member noted that the Distributed	• Some SVG members believed that in the vast majority (potentially around 90%) of instances where a site could Export Energy, the Meter would require replacement.

Generation Coordinating Group (DGCG) (Working paper 001 – March 2003), indicates that approximately 1/3 of meters may not be capable of accurately recording Import Energy separate from any Export. As a result an investigation would be required to establish whether a Meter can or cannot record Import Energy separately from any Export. The D0001 is a investigative flow which serves the purpose of establishing whether the meter requires replacement; • A D0142 is an 'order' to replace the meter, and based on the findings of the DGCG paper, 2/3 of the meter population would not need replacement. A D0142 cannot be used for investigative purposes and could be misused; • Use of the D0001 which carries a PARMS serial, ensures that Suppliers receive better performance from Supplier Agents; and • The D0001 solution provides Suppliers with a confirmation of the meter investigation, as the Meter Operator is obliged to send a D0002 flow (which outlines the investigation) to the Supplier. Although a D0002 could be sent in response to a D0142, this is only optional and not mandatory.	Therefore it is more efficient just to send the D0142; • The D0001 is being used for something other than what it is intended for (this is more than just a meter investigation). There are already issues with overusing the D0001.

6.4 Full details of the SVG discussions are available in the SVG 94 minutes.

7 ELEXON Proposal for Way Forward

7.1 ELEXON invites the Panel to approve CP1260 for inclusion in the June 2009 release. We recommend that CP1260 is approved based on:

- Unanimous agreement at the SVG that a uniform process in one form or another is needed;
- Majority support for CP1260 from the SVG; and
- Majority support for CP1260 in the industry impact assessment responses.

8 Recommendations

8.1 ELEXON invites the BSC Panel to:

a) **NOTE** the BSCP40 processes have been followed; and

b) **APPROVE** CP1260 to be included in the June 2009 Release, based on the majority support from both the SVG and industry.

Sherwin Cotta

Change Assessment Analyst

List of appendices

Appendix A: Impact Assessment responses from the DCP and CP stages
Appendix B: CP1259 'Distribution-Supplier Notification where a Site is Capable of Exporting (microgeneration)'

List of attachments

Attachment A: CP1260 v1.0
Attachment B: CP1260 BSCP514 redlining
Attachment C: Collated responses to the impact assessment for CP1260 (with ELEXON comments)

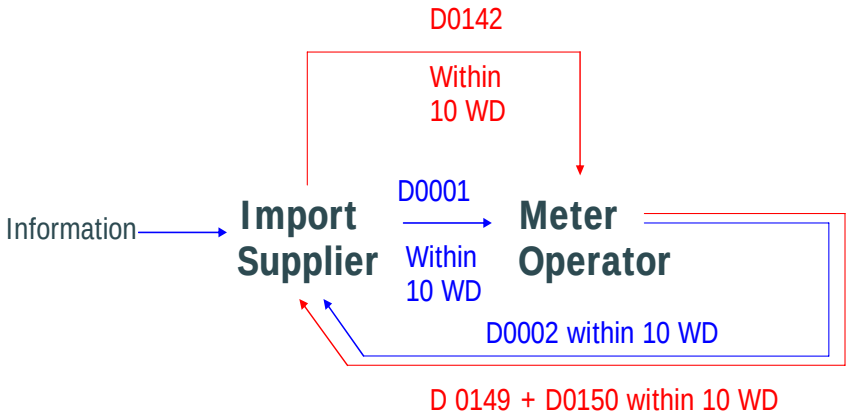
DCP0030 responses are available from the DCP0030 webpage.

Appendix A: Impact Assessment responses from the DCP and CP stages

Impact Assessment for DCP0030 v1.0

DCP0030 contained the original solution from the CP issue 2 Group which was a two stage process. This would take a maximum of 40 Working Days and is shown in the diagram below.

Diagram 1: original BSCP40 issue 2 solution (identical to that presented in DCP v1.0 and v2.0 (option 1));



This meter investigation process involves the Supplier requesting a meter investigation from the Meter Operator (via a D0001). Based on the feedback received from the MO (via the D0002), the Supplier would evaluate whether the Meter required replacement. If so, the Supplier would send D0142 to the Meter Operator, who would respond with the details of the new Meter (in the D0149 and D0150 flows).

Several comments were raised, most notably the fact that the process was too long. Detailed responses are available at the DCP0030 webpage.

Organisation	Capacity in which Organisation operates in	Agree?
TMA Data Management Ltd	HHDC, HHDA and NHHDA	✓
Scottish Power	Supplier, Distributor, HHDC, HHDA, NHHDA, NHHDC, UMSO, MO, MOA, LDSO	✓
Western Power Distribution	Distributor, MOA	✓
E.ON UK Energy Services Limited	HH & NHH DC/DA HH & NHH MO CVA MO	✓
E.ON U.K.	Supplier	✓
CE Electric UK NEDL –	LDSO & UMSO	X

YEDL		
United Utilities	NHHMOA and HHMOA	X
Scottish and Southern Energy	Supplier, Generator, Trader, Party Agent, Distributor, MO, LDSO	X
EDF Energy	Supplier, NHH Agent and HH MOP	X
British Energy	Supplier, CVA MOA, Trader, Generator	X
Siemens Energy Services	NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO, MOA	X
npower	Supplier and Supplier Agents	X
IMServ	MOP, HHDC	-
Electricity North West Ltd	LDSO	-

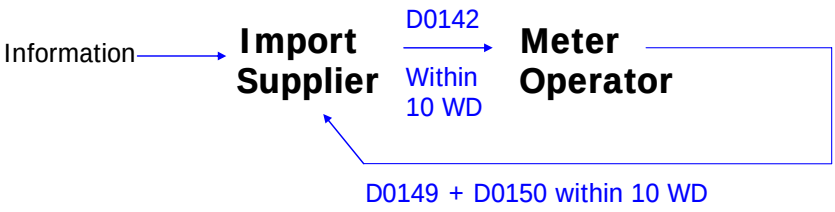
Impact Assessment for DCP0030 v2.0

Based on feedback received during DCP0030 v1.0, ELEXON issued DCP0030 v2.0 including 3 options for the meter investigation process:

Option 1 - the original BSCP40 issue 2 solution (identical to that presented in DCP version 1, shown in diagram 1, above);

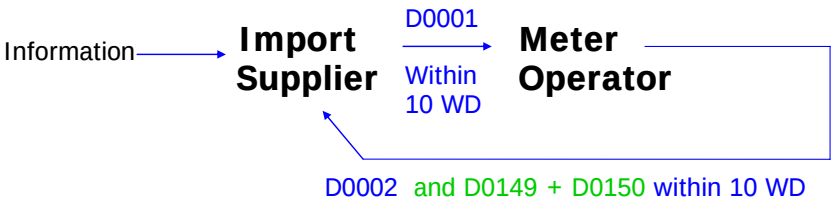
Option 2 - a shortened, one stage solution, which used the D0142 to notify the Meter Operator to investigate the meter (shown below in diagram 2); and

Diagram 2:



Option 3 - a shortened, one stage solution, which used the D0001 to notify the Meter Operator to investigate the meter (shown in diagram 3).

Diagram 3:



ELEXON included two questions, asking which was the preferred solution, and for respondents to highlight any concerns with the lesser preferred solutions.

The majority of respondents stated their preference for the D0001 solution (option 3). The reasons provided were that it was a streamlined solution that used investigative flows for the process. Several respondents highlighted that the D0142 (option 2) was not appropriate as the D0142 is a flow which is used to replace meters and cannot be used for investigative purposes. Detailed responses are available at the DCP0030 webpage.

Organisation	Capacity in which Organisation operates in	Agree?	Preferred solution
Electricity North West	LDSO	✓	1/2/3

Limited			
TMA Data Management Ltd	HHDC, HHDA, NHHDA	✓	3
Western Power Distribution	MOA, LDSO	✓	3
AccuRead Ltd	NHHDC, NHHDA, NHHMOP, HHMOA, NHHMOA	✓	3
EON	Supplier	✓	3
CE ELECTRIC	LDSO	X	none
EDF Energy	Supplier, NHH Agents, HH MOP, NHH MOP	X	3
Scottish and Southern Energy	Supplier, Generator, Trader, MO, LDSO, , NHHDA, MOP, Distributor,	X	2
ScottishPower	Supplier, Distribution, HHDC, MOA, LDSO, MOP	X	3
Npower Ltd	Supplier, Supplier agents	X	3
British Energy	Supplier, Trader, Generator, CVA MOA	X	-
Siemens Metering Services	Party Agent, NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO.	X	none
Association of Meter Operators	Trade Association representing Meter Operators	-	1
E.ON U.K. Energy Services Ltd	HHDC HHDA NHHDC NHHDA MOP	-	No impact

Following this consultation, ELEXON split DCP0030 into two separate CPs (CP1259 and CP1260) to ensure respondent's views were clearly visible against each aspect of the suggested changes.

The majority of respondents to the DCP0030 v2.0 consultation preferred the D0001 solution, so this is the option that was progressed into CP1260.

Impact Assessment for CP1260

A summary of the results of the CP1260 impact assessment is included below. The complete responses are available in Attachment B.

Organisation	Capacity in which Organisation operates in	Agree?
Western Power Distribution	LDSO, MOA,	✓
SAIC Ltd on behalf of: ScottishPower Energy Management Ltd.	Supplier, Distributor, HHDC, HHDA, NHHDA, NHHDC, UMSO, Meter Operator, Trader	✓
Gemserv Ltd	MRA Service Company Ltd (MRASCo)	✓
TMA Data Management Ltd	HHDC, HHDA, NHHDA	✓
British Energy Trading and Sales Limited	Supplier/Trader/CVA MOA/Generator	✓
AccuRead LTD	NHHDC, NHHDA, NHHMO	✓
E.ON UK Energy Services Limited	NHHMO HHMO NHHDC NHHDA	✓
E.ON	Supplier, Shipper	✓
Association of Meter Operators	Trade Association having membership of all active Meter Operators	Yes, with amendment
Electricity North West Ltd	LDSO	✓
Imserv	-	✓
CE Electric		X
EDF Energy	Supplier, NHH Agents and HH MOP	X (would support

		the CP if MRA change approved)
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd; SSE Metering Ltd;	Supplier/Generator/ Trader / Party Agent / Distributor	X
Siemens Metering Services	Party Agent (NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO).	X
NPower Limited	Supplier, Supplier Agents	X

Appendix B: CP1259 'Distribution-Supplier Notification where a Site is Capable of Exporting (microgeneration)'.

ELEXON raised CP1259 *'Distributor-Supplier Notification where a Site is Capable of Exporting (microgeneration)'* in August 2008 which contained the LDSO notification process (part one of DCP0030); where the LDSO notifies the Import Supplier that microgeneration is being installed at a site, using the D0001. The solution did not change from the DCP stage.

The SVG unanimously approved CP1259 for inclusion in the June 2009 release.

Consequently, an MRA CP has been raised which will introduce a new Site Visit Check Code (microgeneration) in the J0024 data field. This will have an impact on D-flows that use this data item e.g. D0001 and D0002. This will be progressed in parallel with the implementation of CP1259.

Change Proposal – BSCP40/02	CP No: 1260 *Version No: 1.0* *(mandatory by BSCCo)*

Title *(mandatory by originator)*

Meter Investigation Process where a Site is Capable of Exporting (microgeneration)

Description of Problem/Issue *(mandatory by originator)*

The purpose of this CP is to ensure that Suppliers are aware when an Import Meter is at risk of capturing Export energy (i.e. when microgeneration will be or has been installed on a site) and to create a process for checking (and if necessary, replacing) the Import metering. There is no requirement to fit an Export Meter.

Background - P213

P213 'Facilitating Microgeneration[1] 'Optional Single MPAN' was raised by E.ON on 27 April 2007. The P213 Modification Group noted in their Assessment Report that a review of the current processes might be useful to understand if there are any Settlement process issues that are preventing a greater take up of the microgeneration solution introduced by P081 'Removal of the requirement for Half Hourly Metering for Third Party Generators at Domestic Premises'.

The Panel requested that the Supplier Volume Allocation Group (SVG) raise a CP issue to consider whether any changes could be made to improve the current microgeneration Settlement processes in the Code Subsidiary Documents (CSDs).

Background – BSCP40 Issue 002

The BSCP40 issue 002 (Review of Microgeneration Processes in the Code Subsidiary Documents) group met twice, considered the microgeneration processes and recommended the following changes be made:

- When informed of the installation of microgeneration, the Licensed Distribution System Operator (LDSO) should inform the Import Supplier that the respective site is capable of Exporting. *This change has been progressed separately as CP1259 'Distributor-Supplier Notification where a Site is Capable of Exporting (microgeneration)'. Please see the 'Version History' below for more information;* and
- The Import Supplier and Meter Operator will investigate whether the relevant Meter can accurately record Import energy separately to any Export energy (e.g. is fitted with a backstop[2]) and, where applicable, replace the Meter with one that can accurately record Import energy separately to any Export energy.

[1] The term 'microgeneration' is not a BSC defined term and references within the CSDs use the term 'Small Scale Third Party Generation Plant' (SSTPGP).

[2] A backstop is an anti reverse mechanism to prevent electromechanical Meters from running backwards, thereby enabling the Meter to deal with reverse energy flow if Export was greater than Import at a particular site i.e. the Meter does not run backwards

Proposed Solution *(mandatory by originator)*

This solution has been developed with the aim of documenting a Meter investigation process where microgeneration **has been or will be** installed at a site.

It consists of the following:

(a) On becoming aware that microgeneration equipment has been or will be installed, the Import Supplier sends a D0001 'Request Metering System Investigation' flow to the Meter Operator to investigate/confirm whether the Import Meter requires a backstop or replacing within 10 Working Days (WD). The D0001 will also provide the MOA with details of the action required should the Meter be unable to measure Import energy separately to Export energy (e.g. install a backstop or replace the Meter).

(b) The Meter Operator subsequently investigates whether the Meter is capable of accurately reading Import energy separately to any Export energy and where appropriate replaces the Meter. The Meter Operator responds to the Import Supplier within 10 WD with a D0002[3] flow to confirm the results of the investigation. A D0149[4] and D0150[5] will also be sent at the same time if the Meter has been replaced.

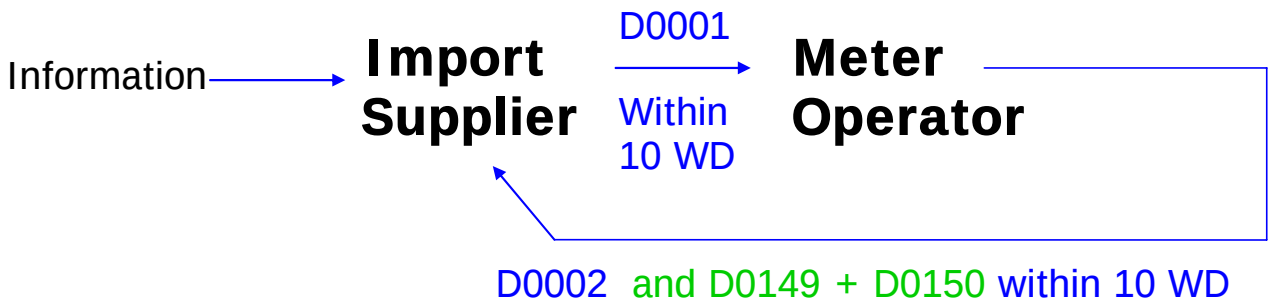


Figure 1(above): illustrates the model as proposed by CP1260.

Justification for Change *(mandatory by originator)*

This will add transparency to the process of microgeneration installation by clearly labelling the instruction to the Meter Operator when Meters are being checked to ensure the Import Meter can accurately capture Import energy separately to any Export energy. The Meter Operator will be given a clear instruction of what to do if a change to the metering is required.

To which section of the Code does the CP relate, and does the CP facilitate the current provisions of the Code? *(mandatory by originator)*

Yes, this change does better facilitate the requirement set out in Section K1.2.1 of the BSC.

Estimated Implementation Costs *(mandatory by BSCCo)*

The estimated ELEXON implementation cost is 2 man days, which equates to £440.

Configurable Items Affected by Proposed Solution(s) *(mandatory by originator)*

BSCP514 'SVA Meter Operations for Metering Systems registered in the SMRS'.

[3] D0002 'Fault Resolution Report or Request for Decision on Further Action'
[4] D0149 'Notification of Mapping Details'
[5] D0150 'Non Half Hourly Meter Technical Details'

Impact on Core Industry Documents or System Operator-Transmission Owner Code *(mandatory by originator)*
None

Related Changes and/or Projects *(mandatory by BSCCo)*
CP1259 'Distributor-Supplier Notification where a Site is Capable of Exporting (microgeneration)' (CP1260 is a standalone solution and is not dependent on CP1259 being approved).

Please note that a separate Master Registration Agreement (MRA) change will be raised, which seeks to amend the D0001 flow. The amendment consists of an additional field in the 'J0024 – Site Visit Check Code' data item which will highlight that the site is capable of Exporting. In the absence of this MRA change the LDSO would be required to use the 'Additional Information' field to provide the required details. This change is required for both CP1259 and CP1260.

Requested Implementation Date ***(mandatory by originator)***
February 2009

Reason:
Next available release.

Version History ***(mandatory by BSCCo)***

This change was suggested as part of the consideration of BSCP40 issue 002.

This CP originated from Part 2 (Option 3) of the solution that was proposed in DCP0030 (i.e. the Import Supplier requesting the Meter Operator to investigate and if applicable replace the meter with one that can accurately record Import energy separately to any Export energy). The two parts of DCP0030 have been split into two separate CPs to ensure respondent's views can be clearly visible against each aspect of the suggested changes.

Prior to this CP, this suggested change was issued as version 2.0 of DCP0030 via the CPC00638, version 1.0 of DCP0030 was issued for impact assessment via CPC00631.

The responses received to both impact assessments are available on the DCP0030 page of the ELEXON website. Three options were provided in version 2.0 of DCP0030. The majority of respondents preferred option 3 and therefore this has been developed further to create this CP.

Originator's Details:

BCA Name…….Sherwin Cotta

Organisation…….... ELEXON

Email Address ……Sherwin.cotta@elexon.co.uk

Telephone Number ……0207 380 4361

Date……27 August 2008

Attachments: Yes
CP1260 Attachment A**:** The addition of a new section '6.3.5' into BSCP514 'SVA Meter operations for Metering Systems registered in the SMRS' Section 6.3 (1 page)

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A new paragraph 6.3.6 is to be inserted following paragraph 6.3.5 in Section 6 as set out below:

6.3.6 On the installation of Small Scale Third Party Generating Plant

REF	WHEN	ACTION	FROM	TO	INFORMATION REQUIRED	METHOD
6.3.6.1	Within 10WD of the Import Supplier becoming aware that a Small Scale Third Party Generating Plant is being or has been installed.	Import Supplier requests a Metering System investigation to confirm that the Meter is accurately recording Import energy separately to Export energy.	Import Supplier	MOA	D0001 'Request Metering System Investigation' Additional information field should be completed specifying the action to be taken if the Meter is not separately recording Import e.g. replacement meter fitted.	Electronic or other method, as agreed.
6.3.6.2	Within 10 WD of 6.3.6.1.	Inform the Import Supplier of the results of the investigation.	MOA	Import Supplier	D0002 'Fault Resolution Report or Request for Decision on Further Action'.	Electronic or other method, as agreed.
6.3.6.3	Within 10 WD of 6.3.5.1 if a change to the Meter has been carried out and in conjunction with 6.3.6.2	Provide the new Meter details to the Import Supplier.	MOA	Import Supplier	D0149 'Notification of mapping details'. D0150 'Non Half-Hourly Meter technical details'.	Electronic or other method, as agreed.

No further changes have been made to this BSCP

IA Summary for CP1260 - 'Meter Investigation Process where a Site is Capable of Exporting (microgeneration)'

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IA History CPC number	CPC00642	**Impacts**	BSCP514, Microgeneration guidance document

Organisation	**Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)**	**Agreement (✓/X)**
Western Power Distribution	LDSO, MOA,	✓
SAIC Ltd on behalf of: ScottishPower Energy Management Ltd.	Supplier, Distributor, HHDC, HHDA, NHHDA, NHHDC, UMSO, Meter Operator, Trader	✓
Gemserv Ltd	MRA Service Company Ltd (MRASCo)	✓
TMA Data Management Ltd	HHDC, HHDA, NHHDA	✓
British Energy Trading and Sales Limited	Supplier/Trader/CVA MOA/Generator	✓
AccuRead LTD	NHHDC, NHHDA, NHHMO	✓
E.ON UK Energy Services Limited	NHHMO HHMO NHHDC NHHDA	✓
E.ON	Supplier, Shipper	✓
Association of Meter Operators	Trade Association having membership of all active Meter Operators	Yes, with amendment
Electricity North West Ltd	LDSO	✓
Imserv	-	✓
CE Electrics		X
EDF Energy	Supplier, NHH Agents and HH MOP	X
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power	Supplier/Generator/ Trader / Party Agent / Distributor	X

Distribution Ltd; Medway Power Ltd; SSE Metering Ltd;		
Siemens Metering Services	Party Agent (NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO).	X
NPower Limited	Supplier, Supplier Agents	X

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement	BSCCo response
Western Power Distribution	✔	**Capacity in which Organisation is impacted:** MOA **Impact on Organisation:** Minor update to working practice documentation Other comments: Don't forget that D0149/D0150s go to other participants and not just the Supplier.	✔	30	BSCCo explained that the section 6.3.6.3 has been amended to refer to an earlier section in the same BSCP, which details the meter replacement process. This avoids duplicating processes within the BSCP. Western Power Distribution has agreed with this suggestion and is in support of this CP.
Scottish Power	✔	**Capacity in which Organisation is impacted:** Supplier, LDSO, MOP, NHHDC, NHHDA **Impact on Organisation:** The change will result in changes to our internal processes. **Would implementation in the proposed Release have an adverse impact? (please state impact)** No	✔	90	

		Comments: For further clarity, we would suggest that a footnote attached to step 6.3.6.1 be included to state that the purpose is to ensure that import is correctly metered and there is no onus to record export.			
Gemserv Ltd	✔	Ensures that Suppliers are aware when an Import Meter is at risk of capturing Export energy and to create a process for checking the Import metering. **Impact:** The D0001 flow would need to be amended to include and additional field for J0024- Site Visit Check Code Data Item **Implementation:** Changes to DTC - Implementation timescales: • From point CP is submitted to MDB decision – approximately 1 month • From MDB approval to implementation – standard implementation timescale for any changes to the DTC is 6 months. Changes would be implemented in line with MRA release strategy (there are three releases a year, in February, June and November). • If it is a system change then from the date of approval, industry would need 6 months to update their systems accordingly. A procedural change would take approximately 3 months. **Would implementation in the proposed Release have an adverse impact? (please state impact)** No	✔		Response noted
TMA Data Management Ltd	✔	-	X	-	-

British Energy	✔	-	-		-
AccuRead LTD	✔	**Capacity in which Organisation is impacted** NHHMO **Impact on Organisation**: This change would require us to amend our NHHMO software in order to receive and respond correctly to the D0001 coming from the supplier using this process.	✔	180	Response noted
E.ON UK Energy Services Limited	✔	This change will minimise the risk of inappropriate metering being used at an export capable site **Impact:** There may be an increase in the number of site visit requests generated.	✔	-	Response noted
E.ON	✔	We support this solution but would recommend that a Working Practice and/or guidance is issued to LDSOs, when populating the free format fields within the D0001 flow. Use of standard text within the D0001 flow from the LDSO to the Supplier would simplify identification of data. For example, there could be two required entries: • Confirmation of the presence of microgeneration; and • type of microgeneration (e.g. solar, wind). Guidance could also be given to LDSOs regarding population of mandatory fields, where data is missing. For example, there may be cases where the meter register id (a "MOP-owned" data item) is not known, but which is contained with the D0001 flow from the LDSO to the Supplier. **Impact:** Supplier	✔		BSCCo explained that the current microgeneration guidance document will be updated if both CP1259 & CP1260 are approved, to reflect the relevant processes. Additionally, the MRA CP, if approved will add a new site visit check code that will make identification of microgeneration easier and would allow simple English to be used in populating the D0001 flow where needed.

		This change (combined with 1259) is likely to involve significant changes to a number of retail systems (IPP, B-Smart, MAD, ICE) – unlikely to be complete by Feb 09, particularly as the associated change to Master Registration Agreement (MRA) has not yet been made visible. System impacts identified - D0001 flows are not currently sent between LDSO and Supplier, so new processes would need to be put in place to route and handle these flows. The new value for data-item J0024 would need to be recognised and business requirements gathered & implemented to process it. Potentially database changes required to store new values. These changes would need to be consistent with those for 1260 – from a system change point of view they would probably need to be done together. **Implementation** Need to put back to release after Feb **Would implementation in the proposed Release have an adverse impact? (please state impact) -** Yes			With respect to the query on populating the mandatory fields in the D0001, BSCCo explained that the LDSO should have records of D0150 for the relevant meter which contains the data needed to populate the D0001 flow. In conclusion E.ON agree with the suggestions made by BSCCo and are in support of this CP.
Association of Meter Operators	Yes, with amendment	The proposed change to BSCP514 should changed so that the proposed step 6.3.6.3 is replaced with, "if meter needs replacement follow process defined in section 6.3.4" The section in 6.3.4 includes all the steps necessary to trigger, perform and notify all relevant parties of the meter change. The proposed 6.3.6.3 does not, and is inconsistent with 6.3.4 which will lead to confusion. **Impact:** MOA will need to modify enquiry processes.	✔	-	BSCCo recommends that the suggested change to the redlining be made.

Electricity North West Ltd	✔	-	✔	243	-
Imserv	✔	We are in agreement with the principle of the suggestion however there are some caveats to this. The use of the D0001 process is acceptable however would result in these requests impacting PARMS serials and also internal monitoring, if they are not clearly identifiable for exclusion. Our acceptance is therefore conditional upon the fact that the D0001 be amended to include a Data Item to enable the clear identification of such instances. As an alternative, the D0005 could be used instead of a D0001 as this already includes Data Item, J0007 (Requested Action Code) which could be more easily extended to cater for such scenarios. It should also be noted that the installation of a suitable meter may have a dependency on the type of contractual arrangements that the MOP has with their Customers/Suppliers and therefore it cannot be assumed or guaranteed that the timescales proposed in the CP are achievable. Indeed these arrangements might totally prevent the installation of such. **Impact:** MOA Process and systems changes would be required, depending on the solution adopted. **Implementation:** A six month lead time would be required from the point of confirmation of the change should the Wheatley MOP application be impacted by the chosen solution. Comments: It is expected that a site visit and on site testing would be required in order to ascertain, with certainty, the	✔	180	Imserv have expressed concerns that there will be costs to exclude these new D0001 flows from the PARMS serial and in ensuring that these reports are the 'newer' version of D0001 so as to introduce consistency in the market. It is felt that the more items that are excluded from a PARMS serial, the more risk there is that not all Parties will be using the same reporting technique. Imserv believe that the D0001 should only be used for a faulty meter and not to question whether the meter can deal with occurrences of microgeneration. Imserv believe that an additional code for the D0005 'Instruction on action' data flow could be used, which could achieve the same output

		ability of mechanical meters in particular, to comply with the micro-generation requirements.			as the new site visit check code for the D0001. This would not skew performance figures that Suppliers and the PAB use. BSCCo explained that meters not recording Import Energy accurately are an issue for Settlement and therefore the PARMS Serial would be useful to ensure required actions are carried out in a timely manner. In addition, the DCP0030 consultation proposed the use of the D0005, however there was majority support for using the D0001 flow. In conclusion Imserv support the CP but feel that consideration should be given to an alternative solution.
CE Electrics	X	**Disagree:** We reject this change in line with CP1259 and suggest a modification to the proposal to include a requirement upon the supplier to request the MPAN record via D0168 data flow upon identification that the import/export metering is in place and the customer is capable of generating electricity.	At present no	-	BSCCo explained that currently Suppliers have the option to register Export in Settlement and that this is not mandated under the BSC. To mandate the registration

					of the Export would require a modification to the BSC. CE electric are still in disagreement with this change.
EDF Energy	X	**Disagree:** Please see details of response to CP 1259. Supplier has same problem with D0002 from MOP as with D0001 from LDSO. **Capacity in which Organisation is impacted** Supplier and MOP **Impact on Organisation:** Current process for dealing with manual D0002s would need to be amended to identify these flows. We think it would be easier to resolve this with a specific requested action code so that flows with this code could be routed to relevant team based on this new code. **Implementation:** If site visit check code change was made then we do not think that this change would be possible until June 2009. **Would implementation in the proposed Release have an adverse impact?** Provided MOP does not send a D0002 requesting further action and changes meter if cannot install backstop then should not be an issues. If not then there is a chance that these D0002s could get missed and settlements impacted.	✔	90	EDF explained that they support this change only if the MRA CP is approved, and if this CP is implemented in June 2009. EDF explained that if the MRA change was rejected, that it would lead to increased manual processing of D flows. Response noted. The proposed implementation date has been moved to June 2009.
Scottish and Southern	X	We are not convinced that the D0001 is the correct flow to use. A D0001 flow is to investigate faults/discrepancies on	✔	365	BSCCo explained that the D0001 was chosen by the

		communication failures A D0142 flow is a request for suitable metering. Following the site visit, a D0002 if meter installed is suitable or a D0149/D0150 if new meter fitted. Not both flows. **Impact** Changes to system and processes			majority of respondents as the preferred solution in DCP0030 consultation. Scottish and Southern have expressed concerns that on a Change of Supplier, the new Supplier may not be aware that customer has equipment capable of microgeneration and remain in disagreement with this CP.
Siemens Metering Services	X	As in our previous response to DCP0030, Siemens Metering Services still believe that the D5 flow would be more appropriate than the D1, for the Supplier to request the site visit from the MOA. The D1 flow relates to Meter fault investigations, and therefore it is misleading to use this type of flow in this instance. D1s and D5s are handled differently. If CP1260 is implemented, this will create a need for manual intervention in order to sort through the D1 fault investigation flows to identify those which require visits to identify if backstops are required, or if the meter requires replacing. **Capacity in which Organisation is impacted** MO **Impact on Organisation:** Process changes would be required. **Would implementation in the proposed Release have an adverse impact?** No adverse impact, assuming implementation is February 2009 (above states date as	✔	90	BSCCo explained that the D0001 was chosen by the majority of respondents as the preferred solution in DCP0030 consultation. BSCCo noted that February 2008 was erroneously reported on the CP response form and confirmed that this CP was due to be implemented in February 2009. However the proposed implementation date has been changed to June 2009. Siemens Metering Services remain in disagreement with this

		February 08 Release)			CP.
NPower Limited	X	Implementation Date should say 2009 The proposed wording of the obligation would mean that Suppliers are obligated to instruct the MOA to undertake an investigation in every instance, which does not take into account Supplier, or MOA Knowledge. The wording should be changed to account for the Supplier MOA Knowledge. We may wish at this point in time to ask our MOP to investigate but in the future that may change as new Metering is installed. Additionally we anticipate that SMART/AMR meters will be able to be remotely reconfigured so references to changing meters/site visits may not be necessary in every case. It also assumes that there will be a single import meter and should an export capability be required then a separate meter will be installed. There are exceptions to these assumptions which will increase in number over time. These are a) the Supplier has or will request the installation of an integrated meter i.e. capable of measuring both import and export energy, or b) the Supplier's metering asset data is sufficiently detailed that they can determine whether to request a meter exchange via the D0142. **Impact:** We believe there will be impact on processes	✔	-	Npower have stated their preference for a November 2009 implementation. BSCCo noted that February 2008 was erroneously reported on the CP response form and confirmed that this CP was due to be implemented in February 2009. However the proposed implementation date has been changed to June 2009. Based on conversations with Npower, the redlining for this CP has been amended to reflect that if a Supplier's MOA is able to confirm that the Meter is accurately recoding Import Energy without a site visit, then a site visit is not required. BSCCo explained that this CP does not place any obligations with respect to the Export meter, and that it is at the Supplier's

					discretion on whether an Export meter is required and the type of meter that should be used. Npower feel that the Supplier should not be obligated to send a D0001 to the MOA and for this reason have disagreed with this CP.

Comments on Redlined Text

No.	Organisation	Section	Comment	BSCCo response
1	**Western Power Distribution**	BSCP514 - 6.3.6.3	Severity - D0149 & D0150s also need to go to the data collector and LDSO	BSCCo recommends that this change be made to the redline text for inclusion in the June 2009 release
2	**Association of Meter Operators**	BSCP514 6.3.4 H	The proposed change to BSCP514 should changed so that the proposed step 6.3.6.3 is replaced with, "if meter needs replacement follow process defined in section 6.3.4" 6.3.4 Reconfigure or Replace Metering System (No Change of Measurement Class)	BSCCo recommends that this change be made to the redline text for inclusion in the June 2009 release
3	**Electricity North West Ltd**	BSCP514 6.3.6.3 Low	if the meter is changed the MOA should update Distributor and Data Collector with the new meter details (D0149/D0150)as well as the Supplier	BSCCo recommends that this change be made to the redline text for inclusion in the June 2009

No.	Organisation	Section	Comment	BSCCo response
				release
4	**Npower**	BSCP514 – 6.3.6.1 - 2	Updates to the redline text to reflect that there is no requirement for an Export Meter, and to take into account the Supplier's MOA knowledge of whether the meter can record Import Energy accurately.	BSCCo recommends that this change be made to the redline text for inclusion in the June 2009 release