

CPC00603 – Impact Assessment of Responses for DCP0004, DCP0005, DCP0006, CP1166 v2.0 and CP1180.

DCP0004

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓	-	X	-
EDF Energy, Supplier Response	✓	-	X	0
E.ON UK plc	✓	The proposed change to BSCP14 is an improvement.	X	-
Centrica	✓	<p>Agree Change Comment: We agree that there is scope for some improvement to BSCP14, however some of the suggested changes do not add any further clarity (some in fact introduce further errors) and should not be made. Please see below for details.</p> <p>Other Comments:</p> <p>The first proposed change in Section 1.6 reduces clarity in the text. It does not specify the number of manifest error claims that should be raised per BOA (this is done in later changes), and simply serves to make a clear statement a potentially misleading one. The subsequent sentence gives the further detail that completes the picture. There is also an error in the suggested text inclusion, in that 'raises' should follow 'Transmission Company', not 'raise'.</p>	X	180

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
		<p>We would suggest that if this paragraph is to be changed to add clarity, the last clause 'whether the acceptance is erroneous in terms of volume or price' could be removed. Section Q doesn't state this particular provision.</p> <p>The remaining changes of substance are all fine, and solve the problem of parties submitting numerous claims on one form.</p> <p>The second bullet in the typographical changes section is a bit confusing, as it changes a grammatically correct sentence into a grammatically incorrect one (no apostrophe needed in 'its')</p>		
E.ON UK Energy Services Limited	-	Neutral to the Change Comment: These changes will not directly impact on our activities	-	-
British Energy Direct Ltd	-	Implementation Comment: Time to update internal processes and procedures.	✓	30
SAIC Ltd. Response provided on behalf of: ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.	✓	-	✓	10
Southern Electric Power Distribution; Keadby Generation Ltd; SSE	-	-	-	-

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;				

DCP0005

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
National Grid plc	X	<p>Please find below comments from National Grid on DCP0005 – Review of Code of Practice 4:</p> <p>1. Throughout the review process we believe that compromises have been made as a result of the differing needs of the CVA and SVA markets. This is fundamentally a high materiality versus low materiality issue and there are good reasons for having different solutions for the two markets, or based on capacity. Having seen the outcome we believe consideration should be given to a clear split with different documents for each. We would prefer retention of the current document unless this one is amended as follows:</p> <p>a) The issue of the effective date should be dealt with in Section L of the Code section 3.2.5. We believe that it is the code that is wrong, however uncomfortable Elexon may feel about addressing it. The effective date should be the date of Registration/ordering of the connection assets. The current draft is complicated in attempting (and not completely satisfactorily) to mitigate for retrospective issues;</p> <p>b) The work of the group was cut short by Elexon despite opposition from the Expert Group. However, a promise was made by Elexon that the group would be re-convened after industry comment. Cop 1 also contains errors as a result of a similar action. It is essential that the group is convened once the industry comment phase is completed.</p> <p>2. We have the following specific comments:</p> <p>5.1.2.4 This paragraph should state that this section replaces the need for both periodic and sample calibration. The last paragraph should be modified to show "meter types" Not "meters".</p> <p>5.1.3 Our meters are likely to be manufactured outside of the UK (China?).</p>	✓	

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		<p>We cannot meet this requirement.</p> <p>5.1.4.1 needs a statement as to how uncertainty is required and confidence limits (as per 5.3.1)</p> <p>5.1.4.5 Is reference to Registrant correct?</p> <p>5.3.1 It is not accepted that multi ratio CTs are tested on all ratios. On a 8 ratio CT this has a significant impact on cost; only the ratio used needs to be tested</p> <p>7.1.1.2 and 7.1.2.2 belong in section 8; clause 7 is for meters only</p> <p>7.3.1. 1 should also state that the effects of temperature are included in the uncertainty budget (see 7.1.1.1)</p> <p>8 This section needs a rehash see 7.1.1.2 and 7.1.2.2 and these then need to be expanded.</p> <p>8.1.2 Does not apply if 8 (i) is the chosen option</p> <p>8 Records: General comment. In the introduction the note is made that periodic calibration is not required and that initial calibration is key. On this basis the validity of calibration records is only relevant at the time of test. We are concerned that say on a 400 kV power station metering (unlicensed work) where the instrument transformers are manufactured in South America with an installed cost of £200k, then who pays for the retest (and consequential lost Generation costs) if the TAA audit after 1 year, and are not satisfied?</p> <p>See comment 1. This document makes no allowance for the cost, risk and timescales of major projects and it will need to, otherwise we will significantly increase the risk margin for any new metering projects in the future. This is a more important section than that for the meters in the CVA world. It is not an option to sweep it under the carpet or dilute it.</p> <p>Our suggestions are that:</p> <p>a) The TAA provide a list of laboratories that are acceptable (both GIS and AIS) for this purpose under (i) and it is clear that the risk lies with the</p>		

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		<p>TAA and;</p> <p>b) Under (i) and (ii) the TAA remit for action is limited to the pre-contract stage; we would present information to them and they would have an opportunity to comment/ reject. This will allow additional contract costs to be factored in, in order to have the transformers tested elsewhere to the TAA satisfaction.</p> <p>Appendix D table D2 - there is no good reason for the uncertainties for type C test being different in tables D1 and D2 if D1 values can't be achieved then the tests shouldn't be done on site. Furthermore, the location (site/laboratory) of the tests should be removed from all of the tables.</p>		
Member of Expert Group and ex Consultant to the Association of Meter Operators	✓	<p>Agree Change Comment: Subject to the majority of issues being resolved. The review is much overdue. The principles agreed by the expert group are acceptable but many variations have slipped in during recent drafts.</p> <p>Other Comments: Question responses</p> <p>1. Do you believe the type of seal used to seal a Meter after it has been calibrated needs to be specified as a Settlement seal or can the test facility provide its own sealing arrangements of any type?</p> <p>A. Ofgem defines a seal to be used on calibrated meters under the "Act". This seal is always used where the meters are certified. Consequently meters used in all CoPs up to CoP3 are fitted with appropriate facilities by the manufacturer. It is unfortunate that similar provisions have not been made for CoP 1 & 2 meters. We are told this is because they are rack mounted. However this process clearly gives the best security both for Settlements and the Customer (whether generator or consumer). I believe seals should be steel wire and ferrule and that method should be specified. However, that will take time to implement via manufacturers and I accept that the paper seal will have to be used in the meantime and a derogation</p>	-	-

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
		<p>should be allowed.</p> <p>2. Do you believe that the sealing arrangements as detailed in Q1 should be specified in CoP4 or BSCP06 and BSCP514 and why?</p> <p>A. Seals are applied by many agents for many purposes. These range from the seal applied to a domestic cut-out by a distribution business to the seal applied to a calibrated meter. However there are many areas in between, for example CTs and VTs that need to be sealed to ensure security and safety, sometimes by more than one agent.</p> <p>I believe these arrangements should all be specified in one place. That should not be CoP4 since it is involved with a small part of this process. Sealing Requirements are currently specified in Appendix 8 of schedule 5 to MOCOPA. These arrangements are regularly reviewed. I see no advantage in specifying these requirements in any other place. BSCPs 06 and 514 should refer to this reference.</p> <p>3. Do you believe a minimum period for replacing/adjusting and re-calibrating Meters/Meters with integral Outstations found to be outside the accuracy limits needs to be separately specified in CoP4 or aligned with existing Meter fault processes as described in BSCP06 and BSCP514?</p> <p>A. A calibration under CoP4 is one means of identifying a metering fault. Failures may also be detected by routine inspection, data collection software report, Supplier report, or even a Customer report. All these are faults and should be treated in the same way. Therefore they should be described in the BSCPs.</p>		
Western Power Distribution	✓	<p>Agree Change Comment: Subject to issues raised below.</p> <p>Impact Comment: Will need to change purchase spec for meters. Will need to generate reports of Calibrations carried out.</p> <p>Other Comments:</p> <p>Question Responses</p>	✓	-

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
		<p>COP4 reviewed by Ian Dobson, Technical metering manager, WPD.</p> <p>1. Do you believe the type of seal used to seal a Meter after it has been calibrated needs to be specified as a Settlement seal or can the test facility provide its own sealing arrangements of any type?</p> <p>A. There is no such thing as a Settlement seal. Ideally it should be a specified seal (as defined in appendix 8 of MOCOPA), so that its application is traceable, but where the "innards" of a meter are transferred between a test house and a meter operator and it is not possible to apply a specified seal, then an indicative seal (to indicate tamper with the calibration adjustments) can be applied until the "innards" are installed into the metering system. Once installed, the MO shall apply specified seals.</p> <p>2. Do you believe that the sealing arrangements as detailed in Q1 should be specified in CoP4 or BSCP06 and BSCP514 and why?</p> <p>A. COP4 so they are all in one document. Sealing practices should be common in CVA and SVA so any changes required need only be made in one place. The details are in MOCOPA appendix A, but should come out and be put in COP4.</p> <p>3. Do you believe a minimum period for replacing/adjusting and re-calibrating Meters/Meters with integral Outstations found to be outside the accuracy limits needs to be separately specified in CoP4 or aligned with existing Meter fault processes as described in BSCP06 and BSCP514?</p> <p>Treat as BSCP06/BSCP514.</p>		
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply	X	<p>Disagree Change Comments: Please see comments below</p> <p>Other Comments:</p> <p>Question responses</p> <p>1. Do you believe the type of seal used to seal a Meter after it has been calibrated needs to be specified as a Settlement seal or can the test facility</p>	-	-

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Limited, Npower Direct Limited		<p>provide its own sealing arrangements of any type?</p> <p>A. We are happy for the test facility to provide its own sealing after calibration, and that these seals should be the manufacturer's seals.</p> <p>2. Do you believe that the sealing arrangements as detailed in Q1 should be specified in CoP4 or BSCP06 and BSCP514 and why?</p> <p>A. Our understanding is that the sealing reference is currently made in the appendices of BSCP06 and BSCP514, referring to MOCO PA and the relevant Codes of Practice. We recognise MOCO PA as the main document to govern sealing protocol for the SVA market, and recommend this reference be specified in CoP4, in addition to the maintenance of the wording in the appendices of the current BSCPs. This is to ensure that obligations under MOCO PA are referenced in the new CoP4.</p> <p>3. Do you believe a minimum period for replacing/adjusting and re-calibrating Meters/Meters with integral Outstations found to be outside the accuracy limits needs to be separately specified in CoP4 or aligned with existing Meter fault processes as described in BSCP06 and BSCP514?</p> <p>A. The existing Meter fault processes in BSCP06 & BSCP514 do not give minimum periods for replacing/adjusting and re-calibrating metering equipment found to be outside of accuracy limits, other than those already specified in the "Investigate Inconsistencies" sections, hence it is not possible to align CoP4 with these. For example, BSCP06 states that a fault needs to be investigated and a report sent within three working days of the fault report being sent.</p> <p>However, there should be a reference made in CoP4 to the relevant CVA and SVA agent obligations within these sections.</p>		
EDF Energy, Supplier Response	-	We have no comments on changes to CoP4 and issues raised below.	-	-
E.ON UK plc	X	Disagree Change Comment: Considerably more work is required on the	✓	-

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		<p>drafting.</p> <p>ELEXON should form an expert review group before the CP.</p> <p>Impact Comment: As drafted, businesses could be immediately non-compliant.</p> <p>Implementation Notification Comment: Better drafting before the CP would allow implementation.</p> <p>Other Comments:</p> <p>Question Responses</p> <p>1. Do you believe the type of seal used to seal a Meter after it has been calibrated needs to be specified as a Settlement seal or can the test facility provide its own sealing arrangements of any type?</p> <p>A. No – the seal does not need to be a Settlement Seal. The facility calibrating the equipment can provide its own seal, which should give a clear indication if the seal has been opened since the calibration has been carried out.</p> <p>2. Do you believe that the sealing arrangements as detailed in Q1 should be specified in CoP4 or BSCP06 and BSCP514 and why?</p> <p>A. No – they should not be included in BSCP06 or BSCP514. These documents are all requirements on the Meter Operator Agent. They cannot be passed on to external bodies such as calibration facilities who are not bound by their requirements.</p> <p>CoP4 may require that meters are sealed as soon as they are calibrated by the test/calibration facility. This would require the MOA to ensure that this is carried out (as it should be by any reputable calibration facility).</p> <p>3. Do you believe a minimum period for replacing/adjusting and re-calibrating Meters/Meters with integral Outstations found to be outside the accuracy limits needs to be separately specified in CoP4 or aligned with existing Meter fault processes as described in BSCP06 and BSCP514?</p>		

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
		<p>A. CoP4 should specifically include a statement along the lines of "Where a meter is found to be out of calibration it should be removed from service and either replaced or adjusted, recalibrated and returned to service in accordance with the timescales described in BSCP06 and BSCP514."</p> <p>BSCP06 requires the CVA MOA to investigate a fault within 3 working days, but does not place any requirements on how long it is before the fault is rectified – these are given in the PARMS.</p>		
E.ON UK, Power Technology	X	<p>Disagree Change Comment: Proposed document contains significant issues which are currently unworkable.</p> <p>As the CoP is retrospective it will also lead to a large number of non-compliances, although the accuracy of data in the Settlements system is not currently in question.</p> <p>Details of calibration routines and accuracy requirements need further revisions.</p> <p>Impact Comment: Will lead to significant changes to records and processes.</p> <p>Implementation Comment: Changes will impact on software and processes, which will need to go through detailed change control and testing process.</p> <p>Other Comments:</p> <p>Question Responses</p> <p>1. Do you believe the type of seal used to seal a Meter after it has been calibrated needs to be specified as a Settlement seal or can the test facility provide its own sealing arrangements of any type?</p> <p>A. No – any seal may be used, provided it gives a clear indication if the meter has been opened so that the calibration may have been affected</p> <p>2. Do you believe that the sealing arrangements as detailed in Q1 should be specified in CoP4 or BSCP06 and BSCP514 and why?</p>	✓	120

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
		<p>A. Only as far as CoP4 should state that the meter should be sealed immediately following calibration. The seal should clearly indicate of the meter has been opened.</p> <p>3. Do you believe a minimum period for replacing/adjusting and re-calibrating Meters/Meters with integral Outstations found to be outside the accuracy limits needs to be separately specified in CoP4 or aligned with existing Meter fault processes as described in BSCP06 and BSCP514?</p> <p>A. CoP4 should specifically include a statement along the lines of "Where a meter is found to be out of calibration it should be removed from service and either replaced or adjusted, recalibrated and returned to service in accordance with the timescales described in BSCP06 and BSCP514."</p> <p>BSCP06 requires the CVA MOA to investigate a fault within 3 working days, but does not place any requirements on how long it is before the fault is rectified – these are given in the PARMS.</p>		
United Utilities	X	<p>Disagree Change Comment: We disagree about the calibration periods for working standards and also that the BSCCo expect to recover costs from MOAs. Also, we don't agree with tables B1 and B2 using Code of Practice as a reference, we believe it should be meter class.</p> <p>Queries</p> <p>Scope</p> <p>Paragraph 2 suggests meter accuracies should be in line with BSCP 06. This BSCP is about the sealing of meters.</p> <p>Wrong reference used.</p> <p>Section 4 (Definitions)</p> <p>There is no definition for a "Test House" or a "Laboratory" and so we have to assume.</p> <p>Section 5.1.4.5</p> <p>Do not agree that BSCCo should have the right to recover reasonable</p>	✓	

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		<p>additional incurred costs from the MOA. What is reasonable additional cost?</p> <p>Section 5.3</p> <p>Are existing CT certificates to be exempt from these requirements?</p> <p>Section 5.5.3</p> <p>Evidence should only be provided to BSCCo on request and not every time a meter is changed as this paragraph implies.</p> <p>Section 7.3.2.2</p> <p>Why are working standards to be calibrated at 3 monthly intervals when this was previously 6 monthly intervals? This is at odds with the reasoning behind the new CoP 4 that is introduced due to greater reliability of new technologies. As manufacturers of working standards propose a 2 yearly calibration I think a 12 monthly calibration is reasonable, provided that statistical evidence is available to support it.</p> <p>As the MOA relies on the LDSO for accurate CT and VT information can we expect tighter controls on LDSOs? Some do no respond to a D0170 dataflow requesting technical details. The information on the dataflows that are received only mentions ratios. There is no mention of serial numbers, class and rating of the transformers. I think this should be brought in to line to assist the MOA and also to ensure the quality of data entering settlements.</p>		
Centrica	X	<p>Disagree Change Comment: We do not believe that the change fully acknowledges the work on Smart metering and we are mindful that this may contradict what is already in place.</p> <p>Other Comments:</p> <p>Question Responses</p> <p>1. Do you believe the type of seal used to seal a Meter after it has been calibrated needs to be specified as a Settlement seal or can the test facility</p>	✓	180

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		<p>provide its own sealing arrangements of any type?</p> <p>A. Yes</p> <p>2. Do you believe that the sealing arrangements as detailed in Q1 should be specified in CoP4 or BSCP06 and BSCP514 and why?</p> <p>A. We actually believe that CoP5 below covers some of this area</p> <p>3. Do you believe a minimum period for replacing/adjusting and re-calibrating Meters/Meters with integral Outstations found to be outside the accuracy limits needs to be separately specified in CoP4 or aligned with existing Meter fault processes as described in BSCP06 and BSCP514?</p> <p>A. Yes</p> <p>Other Comments:</p> <p>CoP5 states that all SVA meters should be sealed in accordance with Appendix 8 and 9 of the Meter Operator Code of Practice Agreement. All meter operators currently comply with MoCoPA and there is no need for this to change as far as we are aware. In CoP5, settlement seals only relate to CVA metering equipment. Therefore if a settlement seal currently only relates to CVA metering, it will need to be detailed in the BSCP's relating to the SVA market.</p>		
E.ON UK Energy Services Limited	✓	<p>Agree Change Comment: Changes do not reflect any significant or unexpected changes</p> <p>1. Do you believe the type of seal used to seal a Meter after it has been calibrated needs to be specified as a Settlement seal or can the test facility provide its own sealing arrangements of any type?</p> <p>A. After calibration, a specific '@settlement' seal needs to be fitted. If left to the particular test facility, a countrywide variation of seal may exist that will only confuse personnel when reviewing/auditing sites.</p> <p>2. Do you believe that the sealing arrangements as detailed in Q1 should be specified in CoP4 or BSCP06 and BSCP514 and why?</p>	-	-

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		<p>A. CoP 4 should allude to the correct sealing but not detail it. The detail needs to be in the BSCP's. This also means that, if sealing methods change, then the CoP 4 is not directly influenced.</p> <p>3. Do you believe a minimum period for replacing/adjusting and re-calibrating Meters/Meters with integral Outstations found to be outside the accuracy limits needs to be separately specified in CoP4 or aligned with existing Meter fault processes as described in BSCP06 and BSCP514?</p> <p>A. Alluded to in CoP 4 but detailed in existing meter fault processes described in BSCP's</p>		
Siemens Energy Services	X	<p>Question Responses</p> <p>1. Do you believe the type of seal used to seal a Meter after it has been calibrated needs to be specified as a Settlement seal or can the test facility provide its own sealing arrangements of any type?</p> <p>A. No – We do not believe that the sealing of a meter after it has been calibrated needs to be a settlement seal. The test facility must be allowed to provide its own sealing arrangements in any acceptable format.</p> <p>2. Do you believe that the sealing arrangements as detailed in Q1 should be specified in CoP4 or BSCP06 and BSCP514 and why?</p> <p>A. No – The purpose of sealing of a meter is to show that no access has been gained to the calibration components of the device since the calibration errors were finalised. The sealing arrangements have to be appropriate to the meter design. The Meter Operator/Settlements seal applied by the Meter Operator, as part of the site installation/commissioning process needs to protect the calibration seal. To specify calibration sealing methods in CoP4 or a BSCP is not appropriate as Meter Manufacturers are not party to the formulation of either.</p> <p>The specification of the calibration seal is more applicable to the IEC design standards for metering equipment. In this way the sealing arrangements can form part of the Product Approval Process.</p>	-	-

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		<p>3. Do you believe a minimum period for replacing/adjusting and re-calibrating Meters/Meters with integral Outstations found to be outside the accuracy limits needs to be separately specified in CoP4 or aligned with existing Meter fault processes as described in BSCP06 and BSCP514?</p> <p>A. Yes – The proposed changes to CoP4 allow a newly installed meter to form part of the settlement process for 8 years before being subject to accuracy testing. The 1% sampling rate allows most meters to remain unchecked for 15 years. There is a risk from inaccurate metering to all parties involved in the Settlement process by leaving a meter untouched for this period of time. Issues will be difficult to resolve after 8 years, impossible after 15.</p> <p>There may be a case for some testing from year one after installation to protect the settlements process and all involved in it whilst volumes are small and involved parties are available. The current proposal for annual reporting of testing results introduces additional work and costs for Meter Operators. This additional cost can be offset if Elexon or the TAA acted on these reports and recommended corrective actions. The basis of the actions needs to be determined by the Review Group or Industry Parties. The location of the corrective action plan appears more appropriate to a BSCP than to CoP4 that concentrates on the way testing is conducted.</p> <p>CoP4 – Comments on a Section by Section Basis</p> <p>Section 1 - Scope</p> <p>Para 2 – References to BSCP06 and BSCP514 are not relevant and should be removed. It is sufficient to state that if a meter falls outside its defined limits, that it is either replaced or adjusted/calibrated so that it falls within the CoP4 accuracy limits applicable for the CoP to which the metering installation complies.</p> <p>Para 3 – It is stated that, save in exceptional circumstance, that Metering Dispensations shall not be granted in respect of this CoP4. Because it is also stated that this CoP is retrospective with effect from the implementation date, the need for dispensations is a certainty. This is</p>		

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		<p>particularly relevant to legacy installations where historic CT and VT certificates do not quote limits of uncertainty. These sites will be immediately non-compliant and require site by site dispensation application. For this area of non-compliance CoP4 should provide generic dispensation for sites commissioned prior to the implementation date.</p> <p>Section 5.1.1 - Types of Calibration</p> <p>Para 2 – Same comment as in Section 1 - References to BSCP06 and BSCP514 are not relevant and should be removed.</p> <p>Para 5 – The ability to take a blank calibrated meter, install it on site and apply compensation from a pre-configured programming file, without the need for a full calibration, must be preserved, particularly in the CoP3/5 arena. Where the measurement device is electronic and electronically programmable, the application of pre-configured compensation correction programming files can be treated as a mathematical function. The requirement to re-calibrate is unnecessary and costly, provided that a suitable Quality Process is used to determine the compensation required. The effectiveness of compensation can be adequately checked by load test/commissioning or comparison with another meter, avoiding the need for full calibration.</p> <p>Application of compensation errors to a Mechanical Meter is normally carried out by the breaking of calibration seals to gain access to jumpers/capacitors. Only when compensation is applied by the removal of calibration seals should it be necessary to repeat a Type A Calibration to check the effectiveness of the compensation. Once calibration has been applied then a new calibration seal will be applied by the test facility.</p> <p>Section 5.1.2.1 – Type A Calibration</p> <p>The current calibration certificates issued by meter manufacturers to BS EN standards differ to the requirements of this CoP4 Appendix B. This anomaly needs to be corrected on a national basis before this CoP4 can be introduced.</p>		

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		<p>Section 5.1.3 – Sealing</p> <p>Same Comment as for specific questions 1 and 2 - We do not believe that the sealing of a meter after it has been calibrated needs to be a settlement seal. The test facility must be allowed to provide its own sealing arrangements in any acceptable format.</p> <p>The purpose of sealing of a meter is to show that no access has been gained to the calibration components of the device since the calibration errors were finalised. The sealing arrangements have to be appropriate to the meter design. The Meter Operator/Settlements seal applied by the Meter Operator, as part of the site installation/commissioning process needs to protect the calibration seal. To specify calibration sealing methods in CoP4 or a BSCP is not appropriate, as Meter Manufacturers are not party to the formulation of either.</p> <p>Section 5.1.4.1 – Calibration Certificates</p> <p>Uncertainty details are not normally available on historic meter accuracy certificates from meter manufacturers. A large number of non-compliance will be generated if the retrospective aspects of this CoP are implemented. Non Compliance with this aspect of the CoP needs to be restricted to sites commissioned after its implementation.</p> <p>To insure that new metering installations are compliant, Manufacturers need to be prepared for this additional requirement before CoP4 can go live.</p> <p>Section 5.1.4.2 – Calibration Report</p> <p>Referenced to Specific Question 3 - The requirement for annual reporting of test results introduces additional work and costs for Meter Operators. This additional cost can be offset if Elexon or the TAA acted on these reports and recommended corrective actions. It will also highlight meter types that have abnormal performance and need special attention.</p> <p>Section 5.1.4.5 – Quality Assurance</p>		

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
		<p>BS EN ISO 9001 is a general standard. BS EN 17025 is specific to the General Competence and Testing and Calibration Laboratories. As this is a preferable and more appropriate standard for meter testing, should this be the expressed as the preferred quality system rather than 9001.</p> <p>Section 5.2 – Sample Calibrations</p> <p>Reference to Specific Question 3 - The proposed changes to CoP4 allow a newly installed meter to form part of the settlements process for 8 years before being subject to accuracy testing. The 1% sampling rate allows most meters to remain unchecked for 15 years. There is a risk from inaccurate metering to all parties involved in the Settlement process by leaving a meter untouched for this period of time. Issues will be difficult to resolve after 8 years, impossible after 15.</p> <p>There may be a case for some testing from year one after installation to protect the settlements process and all involved in it whilst volumes are small and involved parties are available.</p> <p>Section 5.3 – Measurement Transformers</p> <p>Uncertainty details are not normally available on historic CT and VT accuracy certificates from manufacturers. A large number of non-compliance will be generated if the retrospective aspects of this CoP are implemented. Non Compliance with this aspect of the CoP needs to be restricted to sites commissioned after its implementation.</p> <p>To insure that new metering installations are compliant, Manufacturers need to be prepared for this additional requirement before CoP4 can go live.</p> <p>Unless a general dispensation is granted for sites that are prior to the CoP implementation date there will be a large number of non-compliances. There are many sites that have been established and operated without event for the last 20 – 40 years The last thing that the industry requires is the bureaucratic process of raising and dealing with individual dispensation requests on a site by site basis. This issue has to be addressed before the</p>		

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
		<p>CoP can be implemented.</p> <p>CoP4 places the responsibility of maintaining accuracy certificates on the Meter Operator. In reality the Meter Operator has very little control over this process as CT's and VT's are purchased and installed by third parties. For CoP2/3/5 sites it is particularly difficult to obtain CT/VT certificates before the site is commissioned. The responsibility to provide CT/VT certificates is more effectively levied on the asset owner – the distribution company or the customer. This area needs a greater degree of clarity if non-conformances are to be prevented.</p> <p>Section 7.1.1.1 – Temperature Tolerance</p> <p>All temperature tolerances should be included in the uncertainty budget. Reference to a maximum of $\pm 2^{\circ}\text{C}$ needs to be removed.</p> <p>Section 7.1.2 – Calibration Intervals</p> <p>This is a watering down of UCAS Accreditation principals. Some UCAS Accreditation's allow for a 60 month verification frequency, particularly where two reference standards are used back to back and the standards are verified staggered 30 months apart.</p> <p>UCAS Accreditation also permits Reference Standards to be calibrated at intervals of 10 years, where historical drift indicates that this is appropriate.</p> <p>Consideration should be given to the importance of UCAS Accreditation principals.</p> <p>Section 7.3.2.3 – Working Standards</p> <p>Consideration should be given to extending the interval between calibrations beyond 6 months, where suitable historic performance records show that it is safe to do so.</p> <p>Section Appendices</p> <p>In general section headings and table headings are confusing and unhelpful. E.g. there are various meanings assigned to "C" and labelling a</p>		

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
		<p>table B3 in section B2 adds to the confusion. To increase clarity and reduce errors in understanding the headings and references need to be reworked.</p> <p>Appendix A</p> <p>When cross-referencing test points for test B and test C it can be seen that there are no serious additional tests associated with a test C.</p> <p>For half the amount of testing a type C test can extend the life of a metering installation. There appears little point in carrying out a type B test. Particularly as a type C test can be completed on site, there seems little incentive to use the type B schedule of testing. A much better correlation of testing would be achieved if a type C test were only performed in a lab environment.</p> <p>Because of the revenue implications for CVA metering the type C testing in a lab should be a desirable choice.</p> <p>Appendix D</p> <p>Ambient Temperature needs to be included in the Accuracy Basket when calculating uncertainty of error calculation.</p> <p>Table D1 and Table D2 have different test equipment uncertainty levels applied for a type C tests. The level of uncertainty for class 0.2 metering is also different for a type C calibration dependent on where the test is performed – site or lab.</p> <p>The levels of test equipment uncertainty need to be the same for on site testing and lab testing if the revenue calculated by metering systems is to be protected. It would not be helpful to have two different accuracy levels for CVA metering.</p> <p>Tables D1 and D2 therefore need to be consistent in the allowable uncertainties.</p> <p>It is clear that a much better confidence level can be attributed to testing carried out in a lab under table D1. The opportunities for site based</p>		

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
		<p>testing need to be supported by the same confidence limits for achieving the same levels of accuracy.</p> <p>This confusion again supports the original concept that CVA metering should be tested in a lab environment at the prescribed intervals for a type C test.</p>		
British Energy	X	<p>Disagree Change Comment: Although most of the proposed changes are desirable in principle, considerable work is still required to refine and clarify the CoP in practice, and we have particular concerns about potentially inadequate or relaxed calibration standards for new meter types. Evidence should be provided to support any decision to reduce calibration standards from current levels.</p> <p>The BSC Smart Metering and AMR Consultation stated that the revised CoP4 'would detail all BSC commissioning requirements for NHH meters including those with smart meters and AMR'. This draft version of CoP4 does not specifically address the issue of commissioning requirements for NHH meters including those for smart meters and AMR and we ask for assurance that these have been addressed.</p> <p>Detailed comments are attached. Until these and any other issues which arise during drafting are resolved, we feel unable to support the proposed change.</p> <p>Impact Comment: Changes to working procedures and practices would be required, and potential changes to Meter Operator arrangements.</p> <p>Further detailed comments from British Energy regarding DCP0005 can be found in CPC00603 responses – Attachment A</p>	✓	90
Association of Meter Operators	X	<p>Disagree Change Comment: There are too many typographical/clarity errors, together with some fundamental changes which are not fully defined/acceptable to implement as written. However the thrust of the changes are an improvement on the current version and I therefore believe that the remaining issues should be resolved to produce a revised</p>	-	-

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
		<p>version addressing the issues highlighted from the consultation.</p> <p>Other Comments: I believe that this consultation will generate considerable response, from AMO member direct, from the CVA Forum, and the previous Consultant to the AMO who was a member of the expert group. I have no intention to duplicate those comments, many respondents have a far deeper understanding of the issues than I do, all of the comments have some value in consideration – which is one of the benefits of a consultation process! It does appear to me that the issues raised during the consultation fall into two types, non-contentious typographical/clarity and some fundamental contentious issues, like the retrospective application of CoP, the soft start implementation, etc.</p> <p>May I propose the following process which is intended to give visibility of the process and opportunity for the expert group to consider the contentious issues:</p> <ul style="list-style-type: none"> • ELEXON review all the comments made as a result of the current consultation • ELEXON incorporate/amend the draft CoP4 based on the comments received (for all the non-contentious ones – typos, lack of clarity in wording, etc.) • ELEXON produce a revised draft CoP4, together with a commentary document highlighting the comments that have not been included which require further debate • The revised draft CoP4 & commentary should be circulated at least a week in advance of a 'reformed' expert group • The expert group can meet & debate – 1) have all the non-contentious changes been incorporated appropriately. 2) consider the commentary of the more contentious issues, if there is agreement within the expert group then ELEXON should incorporate changes into the draft CoP4. 3) where the expert group can not reach consensus, then ELEXON should document the issue and prepare an 'options paper'. 		

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
		<ul style="list-style-type: none"> • The revised draft CoP4 and the 'options paper' should be circulated for expert group review/comment • After review comments have been satisfactorily included, then the expert group agreed draft CoP4 & options paper should be submitted to ISG/SVA to rule on the options which the expert group could not resolve. • ELEXON update the draft CoP4 reflecting the views of ISG/SVA • Reissue CoP4 changes as CP • Further (limited) comments may be received • Limited comments submitted back to ISG/SVG for approval/rejection • Implement (Feb or Jun 2008) <p>I would also add that no one has a desire to enter into further long series of expert group meetings.</p> <p>Question Responses</p> <p>1. Do you believe the type of seal used to seal a Meter after it has been calibrated needs to be specified as a Settlement seal or can the test facility provide its own sealing arrangements of any type?</p> <p>A. There needs to be a seal which is appropriate to the design of the physical metering equipment, if it can be physically sealed preferably using a wire seal, otherwise a paper seal. The object is to confirm that the device has not been interfered with (accidentally or maliciously) between calibration, commencing and during operational use.</p> <p>2. Do you believe that the sealing arrangements as detailed in Q1 should be specified in CoP4 or BSCP06 and BSCP514 and why?</p> <p>A. A physical method of sealing can not be proscribed in CoP4 or BSCOP06 unless the hardware has been specified to accommodate that method of sealing under CoP1, 2, 3, 5, etc.</p> <p>3. Do you believe a minimum period for replacing/adjusting and re-calibrating Meters/Meters with integral Outstations found to be outside the</p>		

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
		accuracy limits needs to be separately specified in CoP4 or aligned with existing Meter fault processes as described in BSCP06 and BSCP514? A. A meter found to be out of accuracy limits becomes a metering fault from the point of identification.		
SAIC Ltd. Response provided on behalf of: ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.	✓	Question Responses 1. Do you believe the type of seal used to seal a Meter after it has been calibrated needs to be specified as a Settlement seal or can the test facility provide its own sealing arrangements of any type? A. Seal needs to be specified as Settlement. 2. Do you believe that the sealing arrangements as detailed in Q1 should be specified in CoP4 or BSCP06 and BSCP514 and why? A. Sealing arrangements should be specified in BSCP06 and BSCP514 and referenced in CoP4 as any subsequent change to the CoP would result in a new CoP therefore it is easier to reference in COP4. 3. Do you believe a minimum period for replacing/adjusting and re-calibrating Meters/Meters with integral Outstations found to be outside the accuracy limits needs to be separately specified in CoP4 or aligned with existing Meter fault processes as described in BSCP06 and BSCP514? A. It should be aligned with the Meter fault processes as described in BSCP06 and BSCP514.	✓	270
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;	X	Impact Comment: Please refer to CPC00603 responses Attachment B for SSE comments regarding DCP0005. Implementation Comment: There is still a great deal of work to be done on this change proposal before it is fit for purpose. For this reason we don't believe there will be time to implement it for 2008	✓	6 months

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
CVA MOA Forum	X	<p>Disagree Change Comment: Proposed document contains significant issues which are currently unworkable.</p> <p>As the CoP is retrospective it will also lead to a large number of non-compliances, although the accuracy of data in the Settlements system is not currently in question.</p> <p>See below for a detailed response from the CVA MOA Forum.</p> <p>Impact Comment: Will lead to significant changes to records and processes.</p> <p>Implementation Comment: Impact will depend on the MOA.</p> <p>Other Comments: Please refer to CPC00603 responses - Attachment C - DCP0005 – CVA MOA Forum Review of Draft Metering Code of Practice 4</p>	✓	-

Comments on redline text

No.	Organisation	Section	Comment
1	Member of Expert Group and ex Consultant to the Association of Meter Operators	Page 6, Foreword, 1 st para.	The omission of the reference to "Metering Equipment covered by the BSC" is important. Metering equipment may be installed for the benefit of the Supplier or Customer and have no significance to Settlements. Such equipment is not covered by CoP4. The reference should be re-instated.
2	Member of Expert Group and ex Consultant to the Association of Meter Operators	Page 6, 1. Scope	<p>The expert group had included an initial paragraph that referred to the lack of information for NHH equipment. The paragraph was not well drafted and needed further consideration. However it should not be dropped completely.</p> <p>As it now stands I suggest the Scope is incorrect. It does not state "the practices that shall be employed...", since section 6 "is intentionally blank"</p> <p>I believe the expert group were agreed that NHH must be included, but recognise that to include it now would unnecessarily delay the implementation of this document.</p> <p>SVG should initiate further work to consider this as soon as possible, in the meantime words to recognise this should be included in the scope.</p>
3	Member of Expert Group and ex Consultant to the Association of Meter Operators	Page 6, 1. Scope. Last three paragraphs.	<p>The rewording of these paragraphs has significantly changed the intention of the expert group, which related to the role of third parties. The intentio was to clearly state that they also have obligations, this has been considerably diluted by the new wording.</p> <p>The new wording correctly recognises the role of the registrant, but could be construed as implying the MOA and other agents have no responsibility. This was clearly not the intention.</p> <p>The original words also referred to Section L of the BSC, any relevant BSCP, not just 27, and referred to inconsistencies. The meaning here is different.</p>
4	Member of Expert Group and ex Consultant to the Association of Meter Operators	Page 8, 3 References	The sentence "It should be noted that the latest version of each document shall apply." Has been omitted. This should be reinstated, at least in intent. If purchasing equipment, or obtaining services, a MOA would be expected to use the latest specification available, not necessarily the one in use when CoP4 was drafted.
5	Member of Expert Group and ex	Page 10, 4.2.1	This definition was changed subsequent to the last meeting of the expert group. The

No.	Organisation	Section	Comment
	Consultant to the Association of Meter Operators	Traceable	<p>original wording was much shorter and some may have felt lacked detail. However in expanding the definition some important considerations have been overlooked.</p> <p>For example, for sealing equipment, the sealing plier ID, per se, is not important. Its value is in using it to trace the person who last worked on the piece of equipment. The object therefore is that the individual is traceable. This involves a system, including not only the sealing plier ID but a record of the IDs issued to staff.</p> <p>This is why a very simple sentence had been chosen.</p>
6	Member of Expert Group and ex Consultant to the Association of Meter Operators	Page 11, 5 HH Metering Systems. Last sentence	The word “also” should be removed. There is nothing else covered.
7	Member of Expert Group and ex Consultant to the Association of Meter Operators	Page 11, 5.1 Meters Calibration Whole, paragraph	The expert group had deliberately excluded this paragraph as it adds nothing to what follows. The title is sufficient and this paragraph is redundant
8	Member of Expert Group and ex Consultant to the Association of Meter Operators	Page 11, 5.1.1. Types of Calibration 1 st para. After bullet points.	A carriage return seems to have been omitted. Sentence starting “For Calibrations carried out on site....” Should be a new paragraph
9	Member of Expert Group and ex Consultant to the Association of Meter Operators	Page 11, 5.1.1. Types of Calibration Paragraph referred to above and next paragraph.	I see no advantage in splitting this requirement into two paragraphs for on site and in the laboratory. This only adds words and therefore more chance of confusion.

No.	Organisation	Section	Comment
10	Member of Expert Group and ex Consultant to the Association of Meter Operators	Page 11, 5.1.1. Types of Calibration Reference to PARh meters	These were not in the original expert group draft and were introduced after the last meeting. There is no reference to PARh meters (I believe) in CoPs 1,2,3,5,6 Or 7. They were referred to in the old version of CoP4 as they were in the Alpha Codes. They are outdated and unsuitable for current systems. To include them here is an additional complication that will cause confusion and imply that they are acceptable.
11	Member of Expert Group and ex Consultant to the Association of Meter Operators	Page 12, 5.1.2.1 Type A Calibration 2 nd Paragraph	The expert group said "in most case", this has been changed to "in practice". This changes the meaning entirely. In most cases allows an alternative, for example if the meter owner decides to calibrate this meter in his own test house and then treat it as new he may do so. In practice implies it will always be the manufacturer. Please revert to original.
12	Member of Expert Group and ex Consultant to the Association of Meter Operators	Page 12, 5.1.2.1 Type A Calibration 4 th Paragraph	Original words said "certificate shall confirm the tests undertaken". New words say "certificate shall confirm what tests were undertaken". I am not sure the original was correct, but the latter is definitely incorrect. The point is that it is the results that are important and should be included on the certificate. Simply saying what tests were undertaken is not sufficient.
13	Member of Expert Group and ex Consultant to the Association of Meter Operators	Page 13, 5.1.2.4 Calibration of existing....Meter s Bullet Point	This is still very ambiguous. Over the 10 year period, am I required to calibrate 20% each year, 2% each year, or can I leave the whole 20% until year 10?
14	Member of Expert Group and ex Consultant to the Association of Meter Operators	Page 13, 5.1.4.1 Calibration Certificates	The words "amongst other things" have been added. What other things? The previous paragraph identifies the calibration details, this paragraph identifies other matters. Therefore to what does "amongst other things" refer, if there are any they must be specified, if there are not then the words are incorrect. Please remove.

No.	Organisation	Section	Comment
		2 nd Paragraph	
15	Member of Expert Group and ex Consultant to the Association of Meter Operators	Page 14, 5.1.4.1 Calibration Certificates 7 th Paragraph	The words “for the lifetime of the meter” have been added. This is incorrect and inconsistent with the following paragraph. They should be removed. If there is any need to specify at all (and I think not) then there should be reference to settlement timescales following the removal of the meter, it could be disputed for some time after removal.
16	Member of Expert Group and ex Consultant to the Association of Meter Operators	Page 16, 5.2 Sample Calibrations Last paragraph	This example is unnecessary and will cause confusion. There is no requirement for the MOA to evenly phase his type B calibrations. He will most likely leave them all until year 15. As he will be installing meters every year this will not give him an uneven workload. In all probability he will therefore be required to start his 1% at year 8. This paragraph is in danger of introducing a further requirement and is not acceptable
17	Member of Expert Group and ex Consultant to the Association of Meter Operators	Page 17, 5.3 Measurement transformers	This paragraph refers to sample calibrations, there is no such thing for measurement transformers
18	Member of Expert Group and ex Consultant to the Association of Meter Operators	Page 17, 5.3 Measurement transformers	The expert group had deliberately excluded this paragraph as it adds nothing to what follows. The title is sufficient and this paragraph is redundant
19	Member of Expert Group and ex Consultant to the Association of Meter Operators	Page 18, 5.5 Commissioning 1 st paragraph	The expert group had deliberately excluded this paragraph as it adds nothing to what follows. The title is sufficient and this paragraph is redundant
20	Member of Expert Group and ex Consultant to the Association of Meter Operators	Page 18, 5.5 Commissioning 3 rd paragraph	The Elexon lawyer has changed the word “shall” to “must”. Previously he had changed the word “will” to “shall”. I am confused, could we have consistency?
21	Member of Expert Group and ex Consultant to the Association of Meter	Page 18, 5.5.1 Commissioning	This first sentence originally read “.....and record the following where appropriate.” It now

No.	Organisation	Section	Comment
	Operators	tests 1 st paragraph	reads ".....and record amongst other things the following. That has totally changed the meaning and is wrong. All metering systems do not have all of the list of bullet points. You have to choose the ones that are appropriate, hence the expression used was correct.
22	Member of Expert Group and ex Consultant to the Association of Meter Operators	Page 19, 5.5.3 Records 2 nd Paragraph	The words "as required" have been deleted from the end of this paragraph. BSC Co do not need to know every time a meter is changed. To avoid confusion perhaps the paragraph could read:- "If Metering Equipment is changed, then its Commissioning record should be retained by the MOA and provided to BSC Co if required."
23	Member of Expert Group and ex Consultant to the Association of Meter Operators	Page 20, 7 Calibration Equipment for Meters 1 st paragraph	The expert group had deliberately excluded this paragraph as it adds nothing to what follows. The title is sufficient and this paragraph is redundant
24	Member of Expert Group and ex Consultant to the Association of Meter Operators	Page 23, 8 Calibration Equipment for Measurement Transformers 1 st Paragraph	The expert group had deliberately excluded this paragraph as it adds nothing to what follows. The title is sufficient and this paragraph is redundant
25	Member of Expert Group and ex Consultant to the Association of Meter Operators	Page 31, Appendix D	This appendix was changed considerably after the last meeting of the expert group. It was not right before and it is now even worse. In my view it is now simply wrong and needs re-addressing. The principle, I believe agreed unanimously at an early meeting, was that the Types of Calibration (A, B and C) would be specified, where the Calibration would be carried out was agreed as irrelevant. Appendix A specifies the frequency (timing) of the Calibrations.

No.	Organisation	Section	Comment
			<p>Appendix B specifies the test points.</p> <p>Appendix C specifies the error limits.</p> <p>Appendix D should specify the uncertainty requirement for each type of calibration (this may vary by CoP). Where it is done should not be specified.</p> <p>(People are wrapped up in pre-conceptions of what is technically possible in labs and on site, that is necessarily restricted to the present day. Measurement techniques are constantly changing and if we specify where calibrations are to be carried out, simply because that is all we know now, then we will have to review and change this document regularly and that is not necessary if we specify what we want done, not where it is done.)</p>
26	Member of Expert Group and ex Consultant to the Association of Meter Operators	Page 32, Appendix E	This appendix was added after the last meeting of the expert group. Consequently it has not been given any serious review to ensure it meets the requirements.
27	Western Power Distribution	P8 Definitions. First para, 2 nd sentence.	Typo – “Where a capitalised terms <u>s</u> ..” (delete s)
28	Western Power Distribution	P8 Definitions	The existing COP indicates where definitions are as in the BSC, those with the same meaning as the BSC but modified (eg amplified on, by adding examples) and those just for COP4. This is helpful and should be retained in the new COP4.
29	Western Power Distribution	P11 5.1.1 Types of Calibration. Para starting “Meter Calibration shall..” 2 nd sentence.	“The measured errors .. with such measurement uncertainties <u>not exceeding</u> those as stated in Appendix D. (add “not exceeding those”).
30	Western Power Distribution	P12 5.1.1 last sentence	Typo – “before return to service ..” (delete second .)

No.	Organisation	Section	Comment
31	Western Power Distribution	P13 5.1.2.4 Header	" .. Code of Practice1.." (space required).
32	Western Power Distribution	(P12 Calibration	The Draft CP says in the proposed solution section (item 8) that COP3 meters installed in the last 5 years will still required to be tested every 5 years. This is not contained in the draft COP (and was not agreed to by the review group))
33	Western Power Distribution	P14 5.1.4.1 para 8 "Starting For Code of Practices 3, 5, .."	Additionally, if a Type B ...both the Type B and Type C Calibration Certificates should shall be retained. (delete should, add shall)
34	Western Power Distribution	P15 5.1.4.3 Last sentence.	Type – "... Traceable records. ." (delete second .)
35	Western Power Distribution	P15 5.2 Sample Calibrations	"(a) Sample Calibration will apply to all newly installed Meter Types"; and" This appears to have the same meaning as (b). No meter will be sampled for 8 years from initial calibration so it will no longer be newly installed, so no meter will ever be selected for this criteria!! What is this sentence intending?
36	Western Power Distribution	P16 Sample Calibration	The process needs an end date for sampling of any given type. 7 years after starting (15 years after the A Calibration would be when all meters would be into B or C calibrations, so sampling would be superfluous.
37	Western Power Distribution	P16 Sample Calibration	Rather than sample all new meter types for ever, the panel should instruct BSCCo to maintain on the website either an additional item in the Approved Meter Types list or on a separate list indicating which types need to be sampled.
38	Western Power Distribution	P18 5.5.1 Commissioning	"The voltage transformers are the correct ratio and polarity and correctly located to record the required power flow " (add the latter to be consistent with Appendix F.1.1)

No.	Organisation	Section	Comment
		Tests 2 nd bullet point	
39	Western Power Distribution	P19 5.5.3 Records 2 nd para.	If Metering Equipment is changed, then its Commissioning should be evidenced and reported to BSCCo. (delete as indicated) As written, every time a meter is changed, it would have to be reported to BSCCo.
40	Western Power Distribution	P19 5.5.3 Records Penultimate para	An example form of Commissioning evidence is shown in the MOCOPA, Appendix 2, section A2.3 This should be removed as there is a proposal to remove this from MOCOPA, as it is no longer pertinent. It is only an example of a form.
41	Western Power Distribution	P18/19 Calibration	There is no mention of testing the instruments used for commissioning metering systems. Add: "Instruments for Commissioning" The Meter Operator shall have a process to periodically check the instruments used for commissioning. Each instrument shall be traceable (eg have a serial number) The MO shall maintain records to list what instruments are used for commissioning, when an instrument was last tested, and when it is next due for testing. The period of testing shall be determined by the MO, depending on the type of instrument used and manufacturer's recommendations, but in any event not exceed 2 years." (or similar)
42	Western Power Distribution	P27 Appendix B Table B2	COP4 draft shell V0.8 (21/01/07) showed only one table with footnote "For COP5, load points should be as equivalent certification points, ie for 20/100 Meter 100%, 20%, 1% at upf, 100% and 20% (polyphase) at 0.5 lag pf" Table B2 does not reflect these values, and would require manufacturers to do something special. The table needs to reflect the certification test points for 10/100 and 40/100 as well. I list below the certification test point table. I have assumed a "Basic/Max" meter as all

No.	Organisation	Section	Comment
			COP5 meters have been made since 1993. I have not entered any reactive test points as these are not covered by SI 1566 for certifying meters.
43	Western Power Distribution	P27 Appendix B Table B2	Meters can be bought for use as both COP3 and COP5. If tested to COP3 ie to table B1, they should be permitted to be used as COP5. Table B2 requires a footnote "As an alternative, Meters for COP5, 6 and 7 may be tested in accordance with table B1".
44	Western Power Distribution	P27 Appendix B Table B3	Header " B2. Type B Calibration Test Points " needs underlining.
45	Western Power Distribution	P28 Table B4	The re-test values of Type C Calibrations need to be a subset of the Type A Calibrations. Table B4 has more test points than the current table B2 for COPs 5, 6 & 7. Table B4 needs to reflect whatever changes result from point 17 above.
46	Western Power Distribution	P33 F1 2 nd Para	"This Appendix sets out those test and checks, which may .." (delete the ",")
47	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	8	There is a point 4.5 immediately followed by 4.8 – but no 4.6 or 4.7
48	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	10	4.21 Replace a) with original version and remove b). This would then read as follows: Traceable means providing an audit trail so as to identify: a) the person or persons and equipment used. For example this could be works number, sealing plier Id or computer generated signature. b) In relation to Calibration equipment that such equipment has been tested against identified standards held by a test house or an Accredited Laboratory.

No.	Organisation	Section	Comment
49	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	11	The last paragraph of 5.1.1 does not state what type of calibration is required. We believe this should be a type B calibration.
50	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	12	Section 5.1.2.1 'A Type A Calibration shall be carried out to the relevant product standard'. Further clarification required on what a relevant product standard is, i.e. is this recognised by meter manufacturers?
51	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	13	Section 5.1.3 states that meters should be sealed by the manufacturer in accordance with BSCP06/514. Only MOAs can seal in accordance with BSCP06/514 and we would not want to issue manufacturers with our pliers. This should be changed to the manufacturer should apply a manufacturers paper (or metal) seal. The last paragraph states that calibration certificates shall provide a means to identify what equipment was used to carry out the calibration. We can not provide this retrospectively so the majority of our test certificates will become non-compliant immediately.
52	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	14	It is stated that statements of uncertainties covering all measurement points shall be included. This can not be provided retrospectively and again most of our test certificates will become non-compliant. Is it possible to provide measurement uncertainties for all points – what is the benefit of this requirement when a general statement of uncertainty would suffice? Re 'The Calibration Certificates may be held as either hard paper copies, or in 'non-editable electronic format'. However historical information is stored using PDF or Excel documents that are editable. This would make all historical records non-compliant. The 3 rd paragraph 'All calibrations shall be conducted...' requires further clarification. The last sentence of the paragraph will be very difficult to comply with as it is unlikely that

No.	Organisation	Section	Comment
			<p>manufacturers will state that they are a Type A Calibration. This sentence should be removed.</p> <p>The 7th paragraph 'Evidence shall be retained ...' This contradicts the 5th paragraph that states CoPs 3, 5, 6 & 7 only require the latest set of calibration certificates to be retained.</p> <p>What is the benefit of the obligation to inform the BSCCo if calibration certificates are not available? The requirement to conduct a type C test would mean that the meter could not be kept on the wall (as it could if a type B test was conducted utilising on site load). A type C test has more points than a type A. We believe that for CoP3 and 5 the requirement should be to conduct a type B as this will still give the assurance that the meter is recording data to the correct accuracy.</p> <p>The annual calibration report is additional to the work carried out by the MOA at present and there will be a cost associated with it. What is the information going to be used for? The obligation should be placed on the BSCCo to provide a summary of the report to the Panel and to circulate information to the MOAs in order to highlight any makes / models of meter that are less reliable / accurate. If this is not the case, then the current spot checks that the TAA carry out during site policing visits should be adequate. The report may not pick up meters which have become faulty and been replaced. The report format for this should be mandatory to ensure a consistent response. How would this report be managed under P207?</p>
53	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	15	<p>Sections 5.1.4.3 and 5.1.4.4 both state that the MOA shall ensure that the relevant accredited laboratory or test house shall make available all test reports , records and certificates. We may be able to do this going forward but can not ensure this retrospectively. If a test house was to close or a company to cease trading then what assurance would be in place to retain records. Could this lead to a situation were all meters would require immediate replacement?</p> <p>Also section 5.1.4.3 states that the results of all Calibrations and samplings tests performed on meters shall be retained as traceable records. This does not agree with one of the paragraphs in section 5.1.4.1 that states CopPs 3, 5, 6 & 7 only need to retain the latest set of calibration certificates.</p>

No.	Organisation	Section	Comment
54	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	16	<p>States that 'new' meter types should be sample tested. What qualifies as a 'new' meter type?</p> <p>Section 5.2 Sample calibrations is confusing. The first paragraph states that the sample calibrations are in addition to the periodic calibration requirements. However the example at the end of the section indicates that this is not the case if the MOA carries out the periodic calibrations evenly over the 10 or 15 years.</p>
55	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	17	<p>How is 'new measurement transformers' quantified?</p> <p>Section 5.3.3 states that all certificates shall have statements of measurements uncertainties covering all test points. We can not get this information retrospectively so most of our test certificates will immediately become non-compliant. As this is a DNO asset how will this requirement be enforced by the BSCCo?</p> <p>5.3.3 Should maintain the requirement that class 0.5 LV CT's do not require a test certificate if the rating plate on the CT can be visually inspected, as long as the overall accuracy is not exceeded.</p>
56	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	18	<p>The commissioning responsibility should be clearly defined to the responsible party – i.e. DNO for VT/CT and MOA for meter.</p> <p>5.5.1 Should state 'where appropriate' as, dependant on the type of metering system, not all of the requirements are possible.</p>
57	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	19	<p>Section 5.5.3 states that if metering equipment is changed then its commissioning should be evidenced and reported to the BSCCo. Do the BSCCo really want a report every time metering equipment is changed (eg changing out a failed meter)? What would they propose to do with all this data? If the words 'as required' were added to the end of this sentence it would seem more sensible.</p> <p>The final paragraph causes confusion as the requirements are not the same as the referenced 5.1.3-5 as stated. The word 'traceable' would be appropriate in its place.</p>

No.	Organisation	Section	Comment
58	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	23	<p>Section 7.4.2 states that the MOA shall maintain a traceable record of each calibration standard employed in relation to metering equipment. I would expect the MOA to maintain records for any standards that they use themselves but that the relevant test house or contractor should maintain records for equipment used by them.</p> <p>Section 8 states in the second paragraph that 'It is important to note that confidence must be established in the organisations which calibrate current and voltage transformers'. This is very easy for a large organisation to comply with as they have staff who can visit all test facilities. This becomes much more onerous and difficult for the smaller MOA and Registrant.</p>
59	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	26	Table B1 (also tables B3 And B4) uses the letter C to denote all elements combined. However the letter C is also used in table A1 to denote a type C calibration. This could lead to confusion so we suggest a different letter should be used in table B1, B2 and B3, perhaps T?
60	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	27	<p>Table B2 gives an excessive number of test points in our opinion (18 for a bi-directional active meter). At present we use 6 test points for such a meter and we have not found that type C calibrations are finding meters errors that are not picked up during a type B calibration. We suggest that the following test points would be adequate.</p> <p>Active meter (all elements): At 100%I_n Unity, 0.5 inductive & 0.8 (or 0.5) capacitive and at 5% I_n Unity.</p> <p>Reactive meter (all elements): At 100%I_n Zero, 0.866 inductive and 0.866 capacitive and at 5% I_n zero.</p> <p>We don't see that there is any advantage to testing the elements of a 2 or 3 element meter individually. Any inaccuracies would be picked up with all phases combined.</p> <p>Also the notes for table B3 have a typing error. They should read 'These tests shall be carried out for import/export directions....'</p> <p>Tables B3 and B4 have confusing headings, e.g. for table B3 : B2 Type B calibration Test Points Table B3. Type B Meter Calibrations for Codes of Practice 1 and 2</p>

No.	Organisation	Section	Comment
61	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	31	<p>Tables D2 and D4 should refer to site measurements not site tests.</p> <p>On page 31 the tables for uncertainty measurements require some revision. For laboratory conditions (tables D1 and D3) the uncertainties have been doubled for measurements that are not at Unity. This is not the case for site measurements (tables D2 and D4) where the uncertainties are the same for all power factors. This seems unreasonable.</p>
62	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	32	The suggested Records Formats are poor. The tables should be revised and guidance text on filling the tables is added.
63	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	33	<p>The second paragraph states that it is for guidance only whereas the 3rd paragraph states that they are minimum requirements. The term minimum requirements should be removed.</p> <p>Page 33 – the word ‘shall’ is included in paragraph 3 but as this is only guidance then it should not be a definite requirement.</p>
64	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	34	<p>Inspection F1.2.1 the 3rd paragraph contains a typing error and should read ‘Check that measurement transformers and Meters have Calibration certificates for the correct Class and serial numbers and include Meter Compensation where appropriate’.</p> <p>Section F1.2.3 title should read Proving Measurement Transformer Ratios.</p>
65	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	36	Section F1.2.8 The first paragraph states that these tests shall be performed when the system is first energised. However for SVA this may be delayed until the site gains enough load to carry out a significant test usually at least 10% load. CVA suffers from similar problems when a connection is first energised. The words for SVA should be deleted.
66	E.ON UK plc	Common issues	CoP4 is retrospective, with immediate effect. Some clauses included for cut over of testing but there are huge implications for existing metering schemes which will now be non-compliant.

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67	E.ON UK plc	Section 3	MOCOPA is referenced. Where can the document be obtained? This must not be enforced on CVA MOA's who are not signatories.
68	E.ON UK plc	5.1.1, Types of Calibration	In the last paragraph it is unclear what is needed to confirm that the calibration of the compensated meter. Provided that the meter has previously been calibrated then the compensation change could be confirmed through suitably robust QA, a prevailing load check, comparison to a commissioned meter (e.g. the Check meter if Main meter changed) or a commissioning test. This would allow a blank calibrated meter to be installed on site and compensated from a program file, for instance, without the need for a full calibration.
69	E.ON UK plc	5.1.2.1, Type A Calibration	Is there a conflict between the requirements of the BS EN for the meter and the calibration points given in Appendix B? Is it appropriate to ask the manufacturer to calibrate to additional test points outside the BS EN?
70	E.ON UK plc	5.1.2.3, Type C Calibration	Suggest for clarity that a reference to Appendix D is included for details of uncertainties in different locations.
71	E.ON UK plc	Accuracy of On-Site Type 'C' Calibrations	We are very concerned that the Draft CoP4 allows Type C calibrations to be carried out on site to lower levels of measurement uncertainty than are required for type C laboratory calibrations. Type C calibrations are meant to be high accuracy calibrations of the in service meters. Our understanding is that it was originally intended by the review group for Type C tests to be carried out in the Lab, not on site, for CVA meters. This is not stated explicitly and has led to confusion during the discussions on the meter calibration programme. In Appendix D, a wider tolerance on uncertainty is allowed for on site calibration so there is nothing to encourage the lab calibration of these high accuracy meters. We do not want to prevent the calibration being carried out on site if it can be achieved to sufficiently high accuracy and repeatability, and calibration equipment of this standard may become available in the future, however there would appear to be no justification for the differentiation currently included in Appendix D.
72	E.ON UK plc	5.1.2.4, Calibration of 'Existing Installed' CoP 1&2 Meters	Bullet point – the words “without adjustment” imply that there is no need to do any work on a meter that is found to be out of the required accuracy requirements. An additional sentence is required after the bullet point to emphasise that where a meter is found to be outside the accuracy requirements then it needs to be removed from service and either replaced or adjusted and calibrated.

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			The bullet point and the succeeding paragraph could allow an interpretation that meters on existing installation do not have to have a phased calibration regime, bringing them into line with the new CoP requirements. This needs to be clarified.
73	E.ON UK plc	5.1.3, Sealing	<p>In it not appropriate to place BSCP06 and BSCP514 requirements on meter manufacturers and laboratories.</p> <p>The physical design of meter may not lend itself to a wire seal.</p> <p>Allowance must be provided for “non-approved” seal, such as a paper seal, which would still provide evidence that the seal had been broken after the meter was calibrated.</p>
74	E.ON UK plc	5.1.4, Records	<p>General comment – Meters, VT’s, CT’s – uncertainty details are not generally available on older metering equipments. CoP4 requires uncertainty data to be made available on all test certificates and is retrospective. This will lead to a large number of non-compliances.</p> <p>Manufacturers have not had any input into the development of the CoP and may not be aware of its forthcoming issue. These requirements may not be achievable.</p>
75	E.ON UK plc	5.1.4.1, Calibration Certificates	<p>Third Paragraph – “Equipment used and person (or persons) responsible for the calibration” – this level of information may not be included on existing test certificates. For example CEWE manufacturers test certificates do not state the equipment used. This will lead to a huge number of non-compliances.</p> <p>The way that this and the preceding paragraph are drafted suggests that existing Type A calibration certificates need to include more information than new Type A calibration certificates</p> <p>Paragraph 4 – Statements of Uncertainties are not available on a large number of the test certificates for existing meters. As a result there will be a large number of non-compliances against this requirement.</p> <p>Paragraph 6 – Text is ambiguous – what is the Standard? British Standard or Reference / Working Standard? This paragraph also asks for information to be added to the test certificate. We cannot expect the manufacturer or external lab to comply with all the</p>

No.	Organisation	Section	Comment
			<p>requirements stated in terms of information to be placed on the certificate. Suggest paragraph is removed.</p> <p>Paragraph 8 – There are concerns that this allows the audit trail will be lost, so MOA will not be able to show that they have complied with MCoP4 over lifetime of the meter. This is contradicted to some degree by Paragraph 10 where evidence is required.</p> <p>Paragraph 9 – needs to be reconsidered based on outcome of wording for Section 5.1.1 last paragraph</p>
76	E.ON UK plc	5.1.4.2, Annual Calibration Report	<p>This is additional to the work carried out by the MOA at present and there will be a cost associated with it. What is the information going to be used for? The obligation should be placed on the BSCCo to provide a summary of the report to the Panel and to circulate information to the MOA's in order to highlight any makes/models of meter that are less reliable/accurate.</p> <p>How would this be managed under P207?</p> <p>If this is not the case, then the current spot checks that the TAA carry out during site policing visits should be adequate.</p> <p>The report may not pick up meters which have been gone faulty and been replaced.</p> <p>We would suggest that format of report is mandatory. However format in Appendix E is confusing, as it does not capture the necessary information and needs to be completely revised.</p>
77	E.ON UK plc	5.1.4.3 & 5.1.4.4, Inspection of Certificates, Records and Testing/Technical Audit	<p>How does this apply to retrospective certificates where may not be available. Suggest also including a time limit – as in 30 years time a company may not be trading. Suggest include words “where reasonably”.</p> <p>Last paragraph contradicts statement in 5.1.4.1 regarding retention of certificates on CoPs 3,5,6 and 7.</p> <p>There are serious concerns over the transfer of records between MOA's. Meters are owned by customer and transfer of MOA's can be frequent. Under BSCP20 the only requirement is to transfer Meter Technical Details.</p>

No.	Organisation	Section	Comment
78	E.ON UK plc	5.1.4.5, Quality Assurance	<p>Should this requirement be on the Registrant? The Registrant should be able to appoint an Accredited MOA and the accreditation should include the quality process.</p> <p>BS EN for calibration is 17025. Should this be the preferred standard rather than BS EN ISO 9001?</p>
79	E.ON UK plc	5.2, Sample Calibrations	<p>Why do the sample calibrations not start much earlier? – otherwise meters will be in service for 8 years before there is any indication that there could be a problem with the meter accuracy. By this time there may be 000's of meters in service. Routine calibration programme may not start until year 15, by which time many of the meters may be thrown out. As there is no requirement for an end of life calibration these meters will never have been calibrated.</p> <p>It is unclear what is required. Are these additional calibrations if MOA is already doing sufficient type B calibrations during their normal routines? We do not believe that this is intended, but alterations to the wording may be required.</p> <p>What happens if there is a change to a MCoP, such as has just happened under MCoP 1 and 2 where all existing meter approvals become invalid.? Wording in CoP4 suggests that all meter types would immediately require sample calibration even though they are not really new.</p>
80	E.ON UK plc	5.3, Measurement Transformers	See general comment in point 74: uncertainty
81	E.ON UK plc	5.3.1	<p>Suggest that it would be clearer if the sentence referred to equipment installed from CoP4 Effective Date.</p> <p>Paragraph 3 – provides detail on uncertainty of measurement. Same level of detail was not included for meter calibration.</p>
82	E.ON UK plc	5.3.3	<p>General comment – Meters, VT's, CT's – uncertainty details are not generally available on older metering equipments. CoP4 requires uncertainty data to be made available on all test certificates and is retrospective. This will lead to a large number of non-compliances.</p> <p>Manufacturers have not had any input into the development of the CoP and may not be</p>

No.	Organisation	Section	Comment
			<p>aware of its forthcoming issue. These requirements may not be achievable.</p> <p>For existing metering schemes, especially those installed at vesting, certificates may not be available and it was accepted that certificates from equipment with similar serial numbers would be acceptable. For HV reactive metering, certificates were not available and it was accepted that name plate data would be sufficient. In CVA metering systems there will be insufficient data available for the equipment to be included in the national transformer error statement.</p> <p>This section of CoP4 will raise a large number of non-compliances, unless this is treated as an "exceptional circumstance" as covered by paragraph 4. If the CoP is introduced then there will be a large number of applications to the BSCCo for derogations.</p> <p>Where CT's and VT's are not provided by the MOA but are owned by the site or other party so provision of this data may not be within the MOA's control.</p>
83	E.ON UK plc	5.4, Voltage Failure Alarm	CoP does not include confirmation that an alarm is raised and indicated remotely. Suggest this is included.
84	E.ON UK plc	5.5.1, Commissioning Tests	The way that this is written suggests that every commissioning process includes all these steps. This is not necessarily the case. The full list of tests is only appropriate to a new metering installation.
85	E.ON UK plc	5.5.3, Records	<p>Paragraph 2 – original draft had "as required" at end of sentence. As it is drafted BSCCo will get a report from the MOA every time a meter is changed. We do not believe this was the intention. Suggest the original wording be reinstated.</p> <p>See previous comments against 5.1.4.3-5.1.4.5</p>
86	E.ON UK plc	7.1.1.1	Any temperature variation should be factored into uncertainty budgets. Remove last sentence.
87	E.ON UK plc	7.2.1.1	Any temperature variation should be factored into uncertainty budgets. Remove last sentence.
88	E.ON UK plc	7.3.1.1	For consistency we need to include a reference to uncertainty. Also for consistency it should include the effect of temperature variation on uncertainty budget.

No.	Organisation	Section	Comment
89	E.ON UK plc	7.4.2, Records	This implies that where a meter is sent to an external laboratory the MOA then needs to obtain a calibration record of all the standards held by the external lab for that calibration. This is not reasonable.
90	E.ON UK plc	8, Calibration Equipment for Measurement Transformers	It may be difficult for a smaller MOA to gain confidence in the supplier of CT's and VT's. A full scale factory inspection may not be appropriate on an order for a couple of VT's – is it sufficient to buy equipment from a manufacturer with a suitable quality certificate and with equipment supplied to the relevant product standard?
91	E.ON UK plc	8.1.1, Records	This has a specific exclusion for existing metering equipment. Should this apply to all paragraphs in this section?
92	E.ON UK plc	8.1.2	Is this relevant to "Records". Should this paragraph be moved into the main text under section 8?
93	E.ON UK plc	8.1.3	Is this clause retrospective? See also comments above (5.1.4.3 and 5.1.4.4) regarding time limits – in 30 years time the calibration facility may no longer be trading.
94	E.ON UK plc	Appendix B, Tables B1, B3 and B4	Need to clarify whether the "overload" test is required. Normal practice would be to test at 120% of rated current so we presume that it is required?
95	E.ON UK plc	Appendix B, Table B2	There appears to be an excessive number of test points for these on site tests. It should be sufficient to carry out the on-site tests at a reduced number of test points, using the more extensive Type C calibrations to confirm the veracity of the Type B calibrations. This would follow the experience from existing CVA metering systems where there has been no evidence that doing a reduced number of tests has led to less accurate data in Settlements. This can be backed up with previous test evidence if required.
96	E.ON UK plc	Appendix D	<p>(See comments against 5.1.2.3)</p> <p>In order to achieve the required accuracy of calibration at type C calibration for class 0.2 and 0.5 meters it is suggested that Table D1 be applied to type A and type C calibration for active meters, regardless of where the calibration is carried out.</p> <p>Table Heading becomes "Type A and Type C Calibrations".</p> <p>Table D2 becomes "Type B Calibration" only.</p> <p>Similarly for D3 and D4.</p>

No.	Organisation	Section	Comment
97	E.ON UK plc	Appendix E	<p>This table is confusing and is unclear what data is actually required. For instance the third column appears to want 3 figures but quite what is needed is unknown. ELEXON have so far been unable to provide an answer when questioned.</p> <p>Submission also needs space for explanatory text for MOA to provide a narrative on the data they have submitted.</p>
98	E.ON UK plc	Appendix F, F1.2.8	<p>For SVA meters you can wait until the load is 10% of full load to carry out this test, but for CVA meters tests need to be done when the circuit is first energised. For CVA sites prevailing tests are unlikely to be possible as when the circuit is first energised there may be no load.</p> <p>CVA sites, commissioning needs to be carried out before Proving Tests and these then need to be completed before the system is energised. What came first, the chicken or the egg?</p> <p>Suggest that first sentence becomes "carried out when first energised and carrying sufficient load for the tests to provide meaningful results."</p>
100	E.ON UK, Power Technology	5.1.2.3	<p><u>Accuracy of On-Site Type "C" calibrations</u> We are very concerned that the Draft CoP4 allows Type C calibrations to be carried out on site to lower levels of measurement uncertainty than are required for type C laboratory calibrations. Type C calibrations are meant to be high accuracy calibrations of the in service meters. Our understanding is that it was originally intended by the review group for Type C tests to be carried out in the Lab, not on site, for CVA meters. This is not stated explicitly and has led to confusion during the discussions on the meter calibration programme. In appendix D, a wider tolerance on uncertainty is allowed for on site calibration so there is nothing to encourage the lab calibration of these high accuracy meters. We do not want to prevent the calibration being carried out on site if it can be achieved to sufficiently high accuracy and repeatability, and calibration equipment of this standard may become available in the future, however there would appear to be no justification for the differentiation currently included in appendix D.</p>
101	E.ON UK, Power Technology	Appendix D	<p>(See comments against 5.1.2.3)</p> <p>In order to achieve the required accuracy of calibration at type C calibration for class 0.2 and 0.5 meters it is suggested that Table D1 be applied to type A and type C calibration for active meters, regardless of where the calibration is carried out.</p>

No.	Organisation	Section	Comment
			<p>Table Heading becomes "Type A and Type C Calibrations"</p> <p>Table D2 becomes "Type B Calibration" only.</p> <p>Similarly for D3 and D4.</p>
102	E.ON UK Energy Services Limited	7.2.1.1	Section should start with the word Transfer not Reference
103	Association of Meter Operators	3	Copies of MOCOPA can be obtained from www.mocopa.org.uk
104	Association of Meter Operators	4	First para is inconsistent with use of BSC & Code
105	Association of Meter Operators	4.21 b)	Traceability needs to be to the operative with the sealing pliers with that unique Id issued to them at that time, as per BSCP06 or MOCOPA as appropriate
106	Association of Meter Operators	5.1.1	Last paragraph, the approach described here is not very clear, the definition of Compensation has disappeared from this version. The implication of some commentators is that a replacement meter would be "compensated" by adjusting it in line with pre-existing metering (eg replacement main meter adjusted to align with existing check meter) – this is completely counter-intuitive and provides no assurance of an accurate measurement (ie the existing meter accuracy may have drifted). If this approach is repeated then the error can continue to be magnified. The compensation applied should be based on demonstrable calculations auditable by the TAA.
107	Association of Meter Operators	5.1.2.4	The 'soft start' of this CoP4 for certain meter types is not adequately described. It could be regarded as 10% per year over 10 years or that all can be tested in year 9. If this requirement remains then the compliance approach must be explicit to ensure the differing interpretation of the current CoP4 is not perpetuated. Further definition and probably additional examples provided in a guidance note would ensure clear & common understanding.
108	Association of Meter Operators	5.1.3	There needs to be a seal which is appropriate to the design of the physical metering equipment, if it can be physically sealed preferably using a wire seal, otherwise a paper seal. Both wire and paper are recognised as seals in BSCP06. The object is to confirm that the device has not been interfered with (accidentally or maliciously) between

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			calibration, commencing and during continued operational use. A physical method of sealing can not be proscribed in CoP4 unless the hardware has been specified to accommodate that method of sealing under CoP1, 2, 3, 5, etc. This should perhaps raise a potential change to the metering CoPs to ensure the facilities to “seal” are provided within the meter approval.
109	Association of Meter Operators	5.2	Similar comment to Appendix F below, should remove ‘For example’ – is this a requirement of how to do it? Move into a guidance note to expand and clarify the requirement in plainer English. Also recognise that in practice the test pattern is a rolling programme as there is a rolling installation/replacement programme.
110	Association of Meter Operators	5.2 b)	Need to be a little careful that 1% per MOA, per meter type, per CoP per annum does not lead to some MOAs having to test the one out of one that they have within that definition.
111	Association of Meter Operators	5.2 & 5.3.1	Poor drafting, avoid the use of the term ‘new’ and ‘newly’. A ‘newly’ installed meter in 2007 will be an old one in 2017. Does ‘new’ include a refurbished meter which is reinstalled.
112	Association of Meter Operators	5.3	It is unclear whether manufacturer/providers of CT/VTs can provide the uncertainty information now requested. It is proposed that the manufacturers should be approached
113	Association of Meter Operators	5.3	As requesting this information is a new requirement the requirement should be clearly wording as to whether this applies to equipment installed from the effective date or equipment ordered from the effective date. There may be a long lead time from specify/order to commissioning.
114	Association of Meter Operators	5.3	There appears to be a different approach currently operated in the SVA & CVA market with respect to missing CV/VT certificates, often because they were installed years ago or the certificate was simply lost. If there is an agreed approach acceptable to Parties then this could be stated in the CoP4 (or a TAA guidance note), ie CT/VTs installed prior to 1990 are treated as X. This has been an ongoing problem for MOAs who receive TAA non-compliances but do not have the ability to resolve the issue as the absence of records is due to the equipment owner the LDSO, transmission co, or generator.

No.	Organisation	Section	Comment
115	Association of Meter Operators	5.5	Clarification of which tests need to apply when a component of a metering system is changed, fairly obvious for a CoP5 installation with a single feeder, but less clear for a metering stem covering multiple exit points on a generation site.
116	Association of Meter Operators	5.5.1	Instead of 'amongst other things' replace with 'where appropriate'. This again demonstrates that the CoP should clearly state requirements
117	Association of Meter Operators	5.5.3	Not sure BSCCo wants to know every time a piece of metering equipment is changed!
118	Association of Meter Operators	5.12	The broader issue is the retrospective nature of the implementation which may have implications for all 110,000 meter installations. Clearly the new CoP4 would apply to new installs from that date, but for the installed meter base, in what way does it apply? There is no wish to have two documents running in parallel for ten years.
119	Association of Meter Operators	6	Reference to SI 2006/1679 should be included with respect to NHH meters, until a later change implements further details for NHH
120	Association of Meter Operators	8	Some of the requirements appearing here (eg 8.1.1) should be with the CT/VT sections of the relevant CoP1, 2, 3, 5, etc. CoP4 is about commissioning and checking equipment, the definition of standards for what should be installed should be stated within the metering equipment CoPs. CoP4 can then pick up on that the records from the manufactures should be maintained and available, etc. This also resolves the associated effective from date issues.
121	Association of Meter Operators	Appendix A	CoP1 & 2 reactive calibrations may not occur for 20 years after install, then further 20 years. This seems too long, is there any justification for this extended period?
122	Association of Meter Operators	Appendix B	The use of C in this table is confusing with the use of C in Appendix A
123	Association of Meter Operators	Appendix B	The number of test points is thought to be too great. A lower number is said to be adequate, eg table B3. The evidence/rational to justify this number needs to be stated.
124	Association of Meter Operators	Appendix C	'directly connected' could be replaced with 'whole current' to add clarity.

No.	Organisation	Section	Comment
125	Association of Meter Operators	Appendix D	Uncertainty measurements should be irrespective of location of test, either lab or on site. Unclear why a type C test can have different uncertainties dependent upon location of test.
126	Association of Meter Operators	Appendix E	I am aware that others have proposed a format for this report. It should be considered that the CoP should require submission of Calibration records, but the detail of the report format and structure would be specified in a guidance note. For a new process, it is likely that it will take several years of iterations to result in a comprehensive report for all situations.
127	Association of Meter Operators	Appendix F	I have concerns on principle of including 'guidance' into a CoP. Previous experience has shown that this reduces the clarity of the requirement defined in the CoP. Moving the guidance to a TAA or MOA guidance note allows the guidance to be updated & revised based on experience, without having to reopen the CoP. Worst still is where the practice changes without the 'guidance' within the CoP being updated and confusion ensues.
128	SAIC Ltd. Response provided on behalf of: ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.	CoP 4, Issue 5, v4.1 Page 7	2. 'APPLICATION TO OTHER CODES OF PRACTICE' Remove the word 'This' at beginning of sentence.
129	SAIC Ltd. Response provided on behalf of: ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd.	CoP 4, Issue 5, v4.1 Page 12 Section 5.1.1	Should the last sentence make specific reference to CoP 4 as it does in the 'Detailed Level Changes to CoP4 Issue 5 (v4.0) Requirements' document on page 10.

No.	Organisation	Section	Comment
	SP Distribution Ltd.		
130	SAIC Ltd. Response provided on behalf of: ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.	CoP 4, Issue 5, v4.1 Page 19 Section 5.5.2	I believe the BSCP (s) should be referenced or a it may be easier to add a footnote.
131	SAIC Ltd. Response provided on behalf of: ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.	CoP 4, Issue 5, v4.1 Page 20 Section 5.6	I believe the BSCP (s) should be referenced or a it may be easier to add a footnote.
132	SAIC Ltd. Response provided on behalf of: ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd.	CoP 4, Issue 5, v4.1 Page 30	APPENDIX C. MEASURED ERRORS Table C3 is referenced in this document as 'Summary of Class accuracy requirements for Class2 and Class 3' but in the 'Detailed Level Changes to CoP4 Issue 5 (v4.0) Requirements' document on page 24 Table C3 is referenced as 'Reactive Meters Class 2 and 3'

No.	Organisation	Section	Comment
	SP Distribution Ltd.		
133	SAIC Ltd. Response provided on behalf of: ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.	CoP 4, Issue 5, v4.1 Page 35	Section F1.2.5 is referenced as F1.2.6 in 'Detailed Level Changes to CoP4 Issue 5 (v4.0) Requirements' document on page 25. Which is correct?
134	SAIC Ltd. Response provided on behalf of: ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.	CoP 4, Issue 5, v4.1 Page 36	Section F1.2.6 is referenced as F1.2.7 in 'Detailed Level Changes to CoP4 Issue 5 (v4.0) Requirements' document on page 25. Which is correct?

DCP0006

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Western Power Distribution	✓	It makes sense to only include ongoing operational requirements in this BSCP.		
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	X	Disagree Change Comment: We are unsure as to the rationale driving the change. We understand that BSCP515 may be confusing for new industry entrants, however, there is significant benefit to the collated obligations of LDSO. Other agents have specific BSCPs outlining their obligations which are also cross referenced in related documents and corresponding BSCPs (e.g. 514 and 520 both refer to obligations for HHMOA and HHDC). Our concern is that, despite LDSO obligations being covered in related documents, LDSO may lose visibility of these obligations. We also understand from the CP that it was drafted with the intention of clarifying market entry requirements in particular, yet there is substantial revision of section 3.9 Operational requirements. This section outlines the LDSO obligation to send a D0139 flow to HHMOA in the event of De-energisation and Energisation. Whilst we appreciate this obligation is also documented in BSCP514, again there is no logical rationale for removing this obligation from 515. We believe the reduction in the visibility of this obligation is significant. Finally, there is a current Change Proposal, CP1184 "Disconnection of Energised Metering System", due for November release. Both DCP0006 and CP1184 have made changes to section 3.7 of BSCP515. DCP0006 makes further changes to this section (but doesn't appear to be contradictory). With no obvious benefit from this change, and a concern that LDSO visibility of obligation may be affected, we do not support this DCP.	-	-
EDF Energy, Supplier Response	✓	-	X	-
E.ON UK plc, Powergen	-	-	-	-

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Retail Ltd, Citigen (London) Ltd, Economy Power				
Centrica	X	<p>Disagree Change Comment: Further work is required to the CP before Centrica is able to approve.</p> <p>Other Comments:</p> <p>3.6.9 – Does not define what the LDSO should do when he de-energises a meter and a final reading could not be obtained. The reading is optional in the D0139 but mandatory in the D0179. Not clear what the LDSO should send to the NHHMOA.</p> <p>3.6.9 – Where the LDSO changes the energisation status I think it would be a more robust e2e process if the LDSO informed the MOA and the MOA then informed the other parties. This reduces the chance of the supplier processing the flows and advising MPAS when the MOA has failed to process the flow. As energisation status has been on the radar for some time I think this would be useful. This would also remove the need for footnote 18.</p> <p>General - Does not cover the removal or exchange of a meter by the LDSO, this needs to be included.</p>	X	180
E.ON UK Energy Services Limited	-	Neutral to the Change Comment: These changes will not directly impact on our activities	-	-
British Energy Direct Ltd	✓	Agree Change Comments: See redline comments table	X	-
SAIC Ltd. Response provided on behalf of: ScottishPower Energy Management Ltd.	✓	<p>Agree Change Comment: This should improve clarity</p> <p>Implementation Comment: This will allow time to update any relevant documentation in our own library.</p> <p>Other Comments: We are surprised to find that reference to Section 2 of the BSCP would remain following implementation of this change. We were</p>	X	10

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.		under the impression that workflow diagrams were to be removed from all BSCPs, whenever opportune; surely this change represents an ideal opportunity to remove these diagrams from BSCP515.		
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd.	✓	-	X	-

Comments on redline text

No.	Organisation	Section	Comment
1	Western Power Distribution	3.3.3	This section states action required within 1WD of step 3.2.1 but 3.2.1 does not exist. This step actually takes place within 1WD of SMRA accepting a valid registration D0055 from a Supplier.
2	Western Power Distribution	3.5.3 & 3.6.3	<p>For clarity, these sections would benefit from an explanatory footnote.</p> <p>When a LDSO rejects a request within 2 WD it is because they do not consider the request to be a valid request to the LDSO. For example, we may expect the Supplier to instruct their MOA to attend and carry out the change of energisation.</p> <p>The request may also be rejected after 2 WD. For example, LDSO may accept the request but be unable to gain access to the metering point at the time of the appointment. In these cases the “rejecting” D0139 will be sent following the unsuccessful site visit.</p> <p>The current BSCP implies that the change of energisation will always occur if the request is not rejected within 2WD and this is not the case.</p>
3	Western Power Distribution	3.5.3 3.5.5 3.6.3 3.6.9	The way these sections are now worded suggests the LDSO will always send a D0179 for prepayment. The wording should be changed to make it clear that this is a matter of choice for the LDSO as they can send a D0139 in all cases.
4	British Energy Direct Ltd	Page 16, 3.7	In line with market concerns about the sharing of information between Distribution, the Meter Operator and the Supplier in a timely manner, BEDL believe the absence of timescales creates ambiguity.
5	British Energy Direct Ltd	Page 17, 3.8	As above

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Western Power Distribution	✓	Agree with November Release	-	-
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓	Agree Change Comment: We agree to this change, as it supports new technological advance within the industry. We are happy that our concerns surrounding outstation time resets have been conceptualised in the additional notes added to section 4.1.3 of BCP502 and that the CP does not remove any obligation on the DC to perform their daily data capture activities. This said, provision needs to be adequate to ensure that data arriving into HHDC, from an inbound source, is accurate, and is not subjected to tampering or fraudulent activity	-	-
United Utilities	✓	Business processes will need to be modified and staff training required	✓	180
EDF Energy, Supplier Response	✓	Impact Comment: In this form change should have no impact on our current systems and processes	X	0
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy Power	✓	-	✓	60
Centrica	X	Disagree Change Comment: Further work is required to the CP before Centrica is able to approve. Other Comments: CoP 5, 5.5 – For meters that communicate using SMS, there is a need to consider how time synchronisation will happen. This could be automatic (using network) or on request (again from network) as an SMS message would not be able to set the time because of the delay during	✓	180

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
		transmission. The meter would need to report if the time gets out of sync by more than 20 seconds. Less than 15 minutes reset, more than 15 minutes investigate problem. BSCP502 4.1.3 – as above (CoP5, 5.5)		
E.ON UK Energy Services Limited	✓ and X	Agree Change Comment: NHH Market - From an asset perspective the changes only relate to identifying, and responding to, inbound communications. Many of the Smart Meters under review use inbound calls. Implementation of this has do direct effect on Assets as the CoP still encompasses outbound calls. Disagree Change Comment: HH Market - Extensive changes would be required to existing systems changes for little perceived benefit. Impact Comment: NHH Processes and operator interfaces may need to reflect the need to identify whether the data is inbound or outbound. Additional 'structure' of data may also need to be identified. HH Extensive changes to current systems would be required.	✓	-
IMServ Europe Ltd	X	Disagree Change Comment: Whilst the Change Proposal has added a requirement to perform a time tolerance check on a regular basis it doesn't address many of the wider issues. In the case of the 'push' technology the Data Collector is no longer communicating remotely with the meter. This is being undertaken by the modem which is then passing the results to the Data Collector. The modem theoretically becomes part of the accredited data collection solution. This would make the boundaries between Data Collector and Meter Operator less clear. Who would be responsible for ensuring that the protocol on the modem performs the necessary checks and validation? (This CP only addresses only one of these issues, that of time setting, by having the Data Collector perform an ad-hoc remote interrogation). Currently this would be installed and managed by the meter operator, but the functional responsibility would lie with the data collector. How would	✓	-

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
		<p>this be resolved?</p> <p>There are also questions of interoperability that do not appear to have been considered. Combined Meter Operator/Data Collectors could implement solutions that would work so long as they were appointed to both roles, however this could prove problematic when dealing with changes of agent. Would there be a way for a new Data Collector to put their own 'software' on to the existing modem? Would a replacement modem be required?</p> <p>There are other issues, such as dialling costs (does the Meter Operator pick up the costs for dialling, where the current outbound method leaves this to the Data Collector) which are also integral to the question of interoperability and should not be dismissed.</p> <p>We do not believe that the amendments described sufficiently address all of potential issues that have been raised around these proposals. Until such time as these issues are given sufficient consideration we do not agree with the change as written.</p>		
Siemens Energy Services	X	Disagree Change Comment: Please Refer to redline comments below	✓	90
British Energy Direct Ltd	✓	Impact Comment: A change to our processes would need to be actioned.	✓	90
Association of Meter Operators	✓	Agree Change Comment: Subject to couple of clarifications below	-	-
SAIC Ltd. Response provided on behalf of: ScottishPower Energy Management Ltd. ScottishPower Generation	X	<p>Disagree Change Comment: In principle, ScottishPower has no issue with the change to enable inbound reads from CoP5 metering. However, SP system changes would be required if receiving D0268's populated in this way as, at present, they would not expect, recognise or interpret such a populated J1690.</p> <p>Moreover, if this change is implemented, we would argue that the D0155's should also be amended to highlight to the DC the possibility that a site</p>	✓	270

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.		<p>has this type of communication.</p> <p>Is there an Industry expectation that HHDCs should be able to accept all methods of communication?</p> <p>Will there be any other identifiers to allow HHDCs to recognise which type of communication method is being used, as the 'I' indicator would only highlight that the reading is inbound and not the exact method of communication?</p> <p>What was the rationale behind ELEXON raising this change?</p> <p>Impact Comment: System / process changes would be required, leading to significant cost implications.</p> <p>Implementation Comment: If SVG do choose to implement this change then we would require sufficient time to make system changes for the revised D0268 (and D0155) flow(s).</p> <p>Other Comments: Should this CP be implemented, we believe that it would be necessary for security measures 2 & 3 to be subject to approval by SVG, as this would provide some assurance of their adequacy.</p> <p>Redline text for CP1166 v2.0 would appear to be in order.</p>		
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd.	-	-	-	-
Stark Software International Ltd	✓	<p>Agree Comment: This provides extra flexibility to industry participants with no increased risk.</p> <p>Impact Comment: System changes will be required to receive such data,</p>	✓	0

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
		but as the use of Inbound is optional meters could be dialled conventionally.		

Comments on redline text

No.	Organisation	Section	Comment
1	Western Power Distribution	4.1.3	As part of Approval process it should be possible to establish if the comms system maintains the outstation time accuracy, and therefore the Instation should only be obliged to periodically check the outstation clock for the exceptions.
2	Siemens Energy Services	Section 5.5	<p>We are concerned that this would negate the benefits of the system. Please could confirmation be provided on who is responsible for ensuring that the meter times are correct?</p> <p>If the DC is to set the time, we would require further clarification for sites where there may be two data collectors i.e. 1 for Import and another for Export who is responsible?</p> <p>Also, if this is sent by text message, what if a network problem causes a delay of receipt of data?</p>
3	Siemens Energy Services	Section 5.6	<p>If the DC can alter the frequency of the data calls this would impact on the cost of the meter operator. Therefore the MOA would have no control of their comms expenses.</p> <p>There will also be a requirement for all MOA's to alter the charges as they will now have the comms charges, I assume the DC's will be reducing there charges.</p>
4	Siemens Energy Services	Section 5.6 (ii)	We feel this issue ought to be with the Meter Operator as this is their equipment and is programmed up by them, not the DC. We have a concern that erroneous programming can cause meter faults. The metering system belongs to the MO/ customer and we feel third parties should not be programming it.
5	Siemens Energy Services	Section 4.1.2	<p>Not all meters provide this functionality. Especially where a separate DC is being utilised for Import/Export measurement as the meter can have 4 channels, but only 1 is required by the Export DC (AE), although all 4 will be sent. A similar scenario exists for multi-feeder sites being measured by a common outstation.</p> <p>The justification is flawed if;</p> <p>a) all the present data requirements need to be maintained as the cost of particularly text</p>

			<p>messages will be significant due to the large amount of data that needs to be transferred, which will not fit into a standard text message, therefore potentially requiring multiple messages for the same device to be transmitted/received.</p> <p>b) DC's/MO's still need to be able to communicate with the devices and therefore maintain communications infrastructures to support them.</p> <p>c) DC's and MO's will have to invest in new hardware/software to support the devices.</p> <p>d) DC's will have to procure new equipment to enable them to receive "incoming" data in whatever form.</p> <p>e) MO's presumably will now bear the cost of said inbound call charges (inc. text messages), or, more likely, the end customer will.</p> <p>f) The increase in accuracy is an assumption - not fact, as reliability as not yet been proven and the data received is only as good as the installation and MTD's available.</p> <p>g) No mention of the affects to BSCP514, 531, 535, 550 or CoP 3 are alluded to, surely these are affected as well? Potentially BSCP02, 27 & 504 could also be affected, if not straight away, then most certainly at a future date.</p>
6	Siemens Energy Services	Section 4.1.3	<p>Currently the data collected has the time checked on upload and the data is rejected if the meter is out of tolerance how would this be monitored, if the clock drifts this would not be highlighted and the data would be wrong.</p> <p>There are also latency issues within the network which are random how can the time on the meter be assured to be within the CoP limits of 20 seconds, again who would be responsible?</p>
7	Association of Meter Operators	4.1.3	Interrogated is not defined, it currently includes a dial out and a 'hand held' collection. The intention is to enable the DC to a dial out (instation to outstation) at any time, but must dial out within 20 days.
8	Association of Meter Operators	4.1.3	For clarity it might be worth describing the '20 days' as calendar days – as opposed to working days
9	Stark Software International Ltd	COP5 3.2.1	<p>..... no physical communication line (i.e. SMS) the point of connection to the communication system shall be deemed as the communications line...</p> <p>SMS would perhaps be better as an 'e.g.'</p>

CP1180

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
United Utilities (NORW HHMOA & NHHMOA)	✓	–	✓	180
Western Power Distribution	✓	Impact Comment: Likely to require software changes Implementation Comment: 6 months notice so November 2007 would be realistic.	✓	
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓	Agree Change Comment: The new statement to clarify the process 'where no meters present' is already and has always been part of the NHHMO process. Validation will always strive to ensure that where no meter is present, the Energisation status will be consistent with this fact and as such be declared as 'D' for de-energised. We have previously sought clarification that this process is only applicable to MPANs where the MOP already holds a 'MSMTD' date.	-	-
EDF Energy, Supplier Response	✓	This change is currently how we operate and as such does not have any impact.	X	0
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy Power	✓	-	✓	60
Centrica	✓	Agree Change Comment: Good proposal and will ensure metering / Energisation statuses are known when a CoA / CoA concurrent with CoS occurs. Will avoid the numerous calls / chases that currently take place when D0150 flows are not sent. Impact Comment: Timescales to implement new process changes.	✓	180

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
		Other Comments: To further reinforce this Change proposal Centrica would include the requirement in the body of the document rather than as a footnote. This could be done by adding "(if meter present)" after D0149 and "(on every occasion)" after D0150 in the information required column.		
E.ON UK Energy Services Limited	✓	<p>Agree Change Comment: It would help if a D0150 was sent when no meter on site to advise Suppliers.</p> <p>Impact Comment: Our system is unable to send the D0150 when there is no MSMTD date.</p> <p>Other Comments:</p> <p>D0150s are only sent when there is an MSMTD date as this is still mandatory in the flow. We cannot send the D0150 on an MPAN if there is no meter where there has never been a meter i.e. a brand new connection.</p> <p>Unless the DTC is changed, we cannot change MOP to do this so we are compliant as we can be in that D0150s will be sent if a meter is no longer there (i.e. it has been removed) but that is all we can do for the moment.</p>	✓	-
IMServ Europe Ltd	✓	<p>Agree Change Comment: Agreed conditional on below comments being addressed.</p> <p>Other Comments: Overall the basis of the CP is reasonable; however the CP focuses on the impact of the changes required / impacts from a MOP and supplier perspective. It does not take into account the wider impact of this proposal on other parties. We believe that it should as there are wider impacts.</p> <p>Groups 289 and 290 in the D0150 dataflow are currently mandatory in the DTC, hence DTC changes would be required to support this proposal but this is not made clear in the CP. This would require system changes for all systems. Currently, a D0150 with just the 288 groups populated would</p>	✓	-

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
		<p>currently error as in incorrect dataflow.</p> <p>There is no mention or guidance on how NHHDC agents should process the D0150s (received from MOPs) with only the 288 groups populated.</p> <p>We believe that changes would be required to BSCP504 to provide guidance on how NHHDC agents should treat new D0150 dataflows of this nature.</p> <p>There are several questions that immediately come to mind that need answering,</p> <ol style="list-style-type: none"> 1. Should the NHHDC load the de-energised status as set on the flow and store this on it's database (or is the information optional to store – and is just informational). 2. Do the new ES (Energisation Status) value and associated Effective dates become the dates used for settlements on D0019s? Does the new NHHDC agent need to confirm this new ES value to NHHDA on a D0019 or not as would be the case on receipt of a D0139 dataflow? 3. What happens if there is then a mismatch of ES received from the new D0150 'D' from the MOP and the ES contained on the D0152 from the old NHHDC on CoA? Which one takes precedence? 4. Does the receipt of a new D0150 'D' imply that no meter reading history details will be sent from the old DC to the new DC? <p>This "wider impact scope" issue was recently raised at SAF post the implementation of the Half Hourly equivalent part to this CP: this was as a result of the need to defer to SVG post implementation regarding processes which the HHDC should adopt which were not specified in the CP. We feel that similar wider analysis and impact assessment should be carried out prior to this CP being accepted.</p>		
British Energy Direct Ltd	✓	Impact Comment: Changes to systems and processes will need to be actioned.	✓	90

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
SAIC Ltd. Response provided on behalf of: ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.	✓	<p>Impact Comment: This CP will have an impact on Supplier, MO, NHHDC and NHHDA.</p> <p>The processes for Change of Agent and Change of Supplier will be impacted.</p> <p>Other Comments: In commenting on the HH version of this change (CP1159), ELEXON recently stated that all recipients of the MTDs confirming that no meter is present, should take this as confirmation that the site is de-energised. Can Elexon please provide the same clarity on CP1180? Whether the decision is to treat the meter as energised or de-energised the knock on effect on other processes, particularly the Change of Supplier process must be fully documented.</p> <p>As highlighted at discussions at SAF on 18th April, the upcoming implementation of a MO CP (1162) has proved difficult for a number of agents as the full end to end impact of the change was not considered during consultation. As such we would request a revised version of CP1180 detailing the full end to end impact of this CP.</p> <p>At ScottishPower we appreciate the potential benefits of this change and as such do not want to reject the CP. However we can only fully support this change once all impacted areas within both the BSCPs and MRA documentation has been spelt out. We have particular concerns on the D0086, D0300 and D0311 processes.</p> <p>Redline text appears to be in order.</p>	✓	270
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd;	✓	-	✓	6 months

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Medway Power Ltd.				