CPC0000638 – Impact Assessment Responses for DCP0033

DCP0033 - Facilitating smart metering in the Half Hourly (HH) market

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
Association of Meter Operators	Trade Association representing Meter Operators	✓
BizzEnergy Ltd	Supplier	✓
TMA Data Management Ltd	HHDA, NHHDA, **HHDC**	✓
CE ELECTRIC	**LDSO**	✓
EDF Energy	**Supplier**, NHH Agents, **HH MOP, NHH MOP**	✓
Scottish and Southern Energy	**Supplier**, Generator, Trader, MO, LDSO, **NHHDA, Mop,** Distributor,	✓
IMServ	**HHMOA, HHDC**, MOP	✓
Stark Software International Limited	**HHDC**	✓
ScottishPower	**Supplier, HHDC, NHHDC, MOP, Distributo**r	✓
E.ON U.K. Energy Services Ltd	**HHDC HHDA NHHDC NHHDA MOP**	✓
British Energy	Supplier, Trader, Generator, CVA MOA	✓
AccuRead Ltd	NHHDC, NHHDA, NHHMOP, HHMOA, NHHMOA	✓
Electricity North West Limited	LDSO	-
Npower Ltd	Supplier, Supplier agents	-
Energy Services and Technology Association (ESTA)	Trade Association for suppliers of metering equipment and services	x

Detailed Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	ELEXON Response
Association of Meter Operators	✓	**Agree**: Supportive. This will enable customers to benefit from fitting meters and deciding, with their supplier, which market (NHH or HH) in which to trade, without the need to change meters (incurring the customer in cost, disruption and delay). The BERR mandate to install 170,000 AMR meters in the PC5-8 band will assist in reducing the large EAC/AA settlement issues, as meter reading from the larger customers will be regularly obtained.	-	Comment noted.
BizzEnergy Ltd	✓	**Impact**: No mandatory change unless we decided to use this as an opportunity for smart metering in the HH elective market **Other Comments**: BizzEnergy support this change as it facilitates the development of smart metering. We believe that potentially settlement accuracy could be improved as more customers elect to go into the HH market. This may also encourage the development of more innovative tariffs by suppliers – if consumption is settled in the NHH market then there is a risk that energy costs calculated by profiling and chunking do not match actuals.	-	Comment noted.
TMA Data Management Ltd	✓	**Impact**: System and process changes **Other Comments**: TMA support the proposed change because it is an enabling change that allows market participants to enter better quality data into Settlements without creating mandatory change for any market participants. The proposed change	✓	Comment noted.

		removes barriers - but there is no requirement for any market participant to do anything unless they wish to avail themselves of the opportunities that the removal of costs and barriers presents.		
CE ELECTRIC	✓	**Agree**: Agree on the basis that this change will support and encourage accurate settlement data. **Impact**: This change would result in our site specific half hourly DUoS billing system receiving an increase in half hourly data resulting in a potential decrease in system performance. **Implementation**: We would need to asses the capability of our site specific DUoS billing system.	✓	Comment noted.
EDF Energy	✓	**Impact**: Processes will need to be put in place to ensure correct metering is fitted for any particular scenario and if we want to elect to trade a site as HH that is under 100Kw. **Other Comments**: We have not specific comments on change but would just like to ensure our understanding of these changes is correct with regard to fitting of smart meters. Our understanding is: 1 – for a site under 100KW with whole current metering that we wish to trade as HH then meter must be CoP10 compliant. 2 – for a site under 100KW with CT operated metering that wish to trade as HH then meter must be CoP5 compliant. 3 – for a site under 100KW that is to be traded as NHH then requirement is for a CoP8 compliant meter. For example recently a government mandate has been made to ensure that all PC 5 – 8 sites will require fitting of a meter that can be remotely read,	✓	For a site under 100KW with whole current metering traded as HH, the meter must comply with CoP10 or above (e.g. it could also be a CoP 5 meter). For a site under 100KW with CT operated metering traded as HH, the meter must comply with CoP5 or above (e.g. it could also be a CoP 3 meter). For a site under 100KW that is to be traded as NHH then requirement is for a CoP8 compliant meter or above (e.g. it could also be a CoP 10 or CoP 5 meter). When the mandate becomes active, Suppliers will need to consider what metering they require for Profile Class 5 to 8 sites. As part of this consideration, Suppliers will be able to review their preferred metering options

		which would include smart meters. These would need to be fitted using one of three option above. Thinking ahead to when this mandate becomes active then how do we let a MOP know that they are going to a site that is PC 5 – 8 to enable them to install a meter that relates to this mandate and correct CoP requirement. Do we need to consider how this is managed within the market to provide a consistent approach. Also if government mandate is enacted by 1st January 2009 do we need to ensure that this DCP becomes a change that is implemented before that time?		against the CoP10 requirements. There is no issue with implementing CoP10 in February 2009 rather than on 1 January 2009. The proposed amendments to the Electricity Supply Licence (which are currently out for consultation) concern the installation of smart Meters for Profile Classes 5 - 8 with the intention that all Meters within those classes will be smart Meters by the 31 December 2013. They do not impose Settlement requirements. Hence, there is no issue with aligning Settlement requirements at the next available Release.
Scottish and Southern Energy	✓	**Impact**: Process Changes	✓	Comment noted.
IMServ	✓	**Agree**: The Maximum Permissible Energy check currently described in BSCP502 is based on the MPAN CoP. Is this to be expanded to incorporate CoP10 or is this check to be omitted for CoP10 sites? **Impact**: MOA - System change required to exclude CoP10 sites from Proving Test requests DC - DC processes would not be amended until such a time as there was a sufficient of a volume or a commercial request to justify such a change, at which time retrieval processing and associated reporting would be considered. In the interim these sites would benefit from being processed in line with current Industry Standards.	✓	This will be changed to incorporate CoP 10 sites, as part of the Change Proposal. MOA and DC changes would only be required, if the option to trade CoP10 meters HH were taken up. DCP0033 in itself only facilitates this as an option.

		Whilst there are lower volumes there would be little or no cost benefit in attempting to support variable dial frequencies, and the incurred impact on daily reporting.		
Stark Software International Limited	✓	**Agree**: This change should grow HH and improve data quality for larger NHH MPANs **Impact**: Procedural and minor system changes to identify and react differently to measurement class E.	✓	Comment noted.
ScottishPower	✓	**Agree**: While the principles underpinning the measures contained in the draft Change Proposal are welcomed We would like to understand the cost or process benefits. The change rests on the benefits of dropping certain obligations (e.g. proving tests) but these are not detailed anywhere. Without such data it is difficult to balance the additional costs of managing such MPANs and as such further detail is required prior to the DCP progressing However, the new COP 10 seems an appropriate means of facilitating the use of AMR / smart metering in the sector and allowing their use in both the HH and NHH trading markets. **Impact**: There is a potential impact on our systems as well as an impact on internal processes **Other Comments**: As these meters can be used in the HH market it may be necessary for them to record reactive energy. It would be useful if the DCP would consider the proposed modification P224 which could affect how reactive energy is recorded and could affect smart metering in relation to how it records and sends this data. To reduce the risk of the documents contained within this DCP having to be revisited it would be prudent to consider the implications for them where P224 to be implemented.	✓	The Smart Metering Expert Group considered whether a cost benefit could be obtained. It was decided that Data Collectors were likely to be unwilling to disaggregate the cost of proving tests and site visits, as this is commercially sensitive. The cost benefit would also depend on the extent to which the option to trade HH is taken up. As such, it was agreed that Suppliers and agents were likely to perform their own cost-benefit analysis, when determining whether to utilise the CoP 10 arrangements, but this was not a dependency in terms of implementing an enabling change. The Metering System's Measurement Class identifies whether it is traded as NHH or HH elective. The P224 Modification Group discussed the potential interactions between P224 and the proposed CoP10. It was noted that the introduction of CoP10 is a facilitating measure. If the additional requirements proposed by P224 for allocating Reactive Power to the Party

		Another query we have which we believe has not been considered within the DCP is how would a potential new Supplier be able to identify that the meter is being traded in elective HH or in NHH? Currently the MDD data would not be able to show this as there are no established MTCs to facilitate this Though we have agreed the DCP in principle, we feel it requires further clarification before being progressed to the CP stage.		responsible for the flow of Active Power at that time (therefore requiring meters to separately measure 'Import Related' and 'Export Related' Reactive Power) is applied fully to CoP10 the feasibility and rationale of CoP10 could potentially be undermined. With that in mind the P224 Modification Group agreed that the appropriate Panel Committee could decide to exempt the P224 requirements from the CoPs for elective Half Hourly Meters (i.e. Import less than 100kW and Export less than 30kW) in favour of alternative requirements that are more appropriate for particular CoPs. This exemption would be sought for CoP10 during the implementation of P224, if approved. In any case, CoP10 is targeted at the February 2009 Release, and P224 is targeted at the November 2009 Release. Until P224 is approved CoP10 should be drafted against the current BSC requirements.
E.ON UK Energy Services Limited	✓	**Agree**: In general terms we would support the facilitation of this process. From a Metering point of view our current smart metering solution would be appropriate. However from a MOP & DC point of view changes to systems and processes would be required	-	Changes to MOP and DC systems would only be required where Suppliers and agents wished to actively participate. DCP0033 is purely an enabling change, so wouldn't require any MOP or DC changes.
British Energy	✓	**Agree**: subject to the following concerns being considered prior to the raising of a related CP.	X	Additional levels of security would not be precluded. Other changes will be

		Under Section 5.4, where it is possible to remotely configure the active periods for each meter rate/register, access to perform this task must be subject to an appropriate security level – suggest a new level 4 is introduced for configuration of this nature. **Other Comments**: The CoP5 red-lining is helpful for comparing the differences with CoP10, however it should be made clear that no changes to CoP5 are proposed under this DCP.		required when remote configuration becomes a reality, because it raises issues about who would be allowed to carry out remote configuration. Security issues relating to such remote configurations can be addressed in conjunction with such changes. For the CP the wording in CoP10 has been changed to emphasise that additional levels of security are not precluded. The new Section 5.4 wording now specifies 'A security regime allowing for at least the levels of access as defined below:', and then defines the 3 required levels. The CoP5 red-lining was useful for the DCP, but will not be included with the CP.
AccuRead Ltd	✓	-	X	
Electricity North West Limited	-	-	X	Comment noted.
Npower Ltd	-	**Neutral**: We appreciate the time and effort that the Smart Metering Expert Group has put into assessing this issue and we recognise the merit and potential of the proposal. Analysis of its wider impact on our organisation is being carried out and at this point we cannot definitively state whether we support or reject this proposal. Whilst the dialogue between government and industry over the detail of its metering policy for all NHH consumers is ongoing, the timing of this change is not helpful. At their highest level these discussions are looking to assess the functional requirements of smart meters and the market model under which	✓	The ongoing dialogue between the government and industry over the detail of its metering policy for NHH customers, relates primarily to Profile Classes 1 to 4. Advanced Metering for Profile Classes 5 to 8 will (barring only a final consultation on the licence changes) be required from 1 January 2009. Putting in place Settlement requirements about the potential Settlement use of HH interval data from these Advanced Meters sooner rather than later, will inform Suppliers

		they will operate. There is a risk to the industry that the implementation of a new metering practice before the policy discussions have played out could prove wasteful. It is surely better to await the conclusion of this work and for clarity of the metering requirements to evolve before this change is progressed further. In addition, there are implications for the Change of Supply process which need further consideration. Although CoP 10 would be a voluntary code (i.e. you choose to be HH, rather than being mandated to do so), the transition at Change of Supply means that a Supplier would have to develop processes in place to support CoP 10 customers regardless of whether they intended to pro-actively offer such products themselves. From a HHDC point of view, it is likely that this would require substantial system changes to support the obligations for the different Codes of Practice. A DTC change would also be required to include CoP 10 in the valid set for data item J0418, which is currently null in the D150 and mandatory in the D0268. This too would involve system changes to amend the valid set. Clarity on responsibilities is also needed, for example, would the obligation to obtain a Meter Reading at the time of the remote Change of Measurement Class be on the MOA? If a CoP 10 meter is initially installed as NHH and subsequently elects to trade HH, there would be insufficient information to populate the D0268. A site visit would then be needed to obtain the data reducing the benefit of the proposal. There also needs to be a link back into BSCP601so that DCs are authorised to use CoP 10 meters. In summary, we continue to review this proposal to		decisions about the type of metering to install. Suppliers would not need to develop any special processes to support CoP 10 customers. They could continue to require their agents to carry out proving tests and site visits in the same way that some Suppliers treat Measurement Class C and E Metering Systems in the same way now. That would remain a commercial decision. Responsibilities for reconfiguring the meter and obtaining a reading would remain unchanged, until such time a requirement to change them is identified. If a CoP 10 meter, or indeed a CoP 8 meter is installed and is remotely read, additional information will be required over and above the D0150 in any case, irrespective of this DCP (unless the D0150 is amended to support remotely read NHH sites).

		understand fully its implications and thereby determine our final opinion.		
Energy Services and Technology Association (ESTA)	X	Not without further clarification. ESTA believe in open systems - the current Cop10 may not give the customer sufficient access in line with the BERR / Ofgem requirements for smart metering below 100kW. This applies particularly where areas are not fully specified or unclear. Since Elexon have a high influence over specification of metering equipment, ESTA are keen that Cop10 represents as near as possible the requirements of BERR and the customer, in addition to requirements for Settlements. ESTA also believe that some of the changes may cause undue risk to Settlements. ESTA are willing to be part of the smart metering group to assist with the development of these specifications. Clarification needed – will HH data be used for settlements in NHH market? If yes, then the comments below apply – if no then a new document is unlikely to be necessary, and will only be restrictive to potential market		Section L 5.1.2 of the BSC allows customers access to Metering Data. This is unchanged by DCP0033. Where aspects of metering are not fully specified, it is because there are no Settlement requirements in those areas. HH data will not (and cannot) be used in the NHH market. Far from being restrictive, the DCP aims to open up the HH market to Metering Systems below 100 kW, by introducing a set of requirements that are more appropriate to those sites in the target <72KW whole-current band than the existing mandatory HH requirements, which were designed for Metering Systems above 100kW.

Comments on Redlined Text

No.	Organisation	Section	Comment	ELEXON Response
1	**Electricity North West Limited**	Code of Practice 10 Section 4.1.1 last sentence	Please replace the words 'are likely to' with 'will', so the sentence reads; "While Active Energy values are a Settlement	Because we can't say with absolute certainty that all LDSOs, including IDNOs, will have requirements for reactive energy,

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			requirement the Reactive Energy values are not, but will be required by Licensed Distribution System Operators (LDSO)."	'are likely to' seems the safer option. Even where the requirement exists, it won't be for all Meters.
2	**Electricity North West Limited**	Code of Practice 10 Section 5.2.1 last sentence	Please replace the word 'may' with 'will', so the sentence reads: "MD is not a Settlement requirement, but will be required for Distribution Use of System (DUoS) purposes.	Because we can't say with absolute certainty that all LDSOs, including IDNOs, will have requirements for MD, 'may' seems the safer option. Even where the requirement exists, it won't be for all Meters.
3	**Energy Services and Technology Association (ESTA)**	CoP10 Sec 5.3 para 2,3	Protocol Testing / Approval. Our understanding is that this requirement may be removed because of consumption level and the fact it's not currently done in NHH. We believe it would be a mistake to remove this. Protocol Approval will pick up system bugs that would be compounded in the field. Also making available the protocol/approval documents is useful for in-station / HHU system developers who need to include new protocols in their systems.	Formal protocol testing / approval under BSCP601 will remain a requirement where Meters are traded HH. For NHH Metering Systems the intention is to put in place higher level requirements for remote reading assurance (via forthcoming CP1253), where BSCP601 may be used, but will not be mandated. This is because the Expert Group was of the view that we shouldn't constrain future developments around interoperability for the domestic and Profile Class 3 and 4 sectors.
4	**Energy Services and Technology Association (ESTA)**	CoP 10 Section 6	We were not clear about the customer's access to data which is described as "the Code and BSC procedures referred to therein". Can we clarify that the customer has the right to read his data.	Section L 5.1.2 of the BSC allows customers access to Metering Data. This is unchanged by DCP0033.
5	**Energy Services and Technology Association (ESTA)**	CoP 10 Sec 5.3 para 6	Time trimming appears only to be required for HH sites, and not for NHH. We have noticed that some NHH sites are more than 3 hours out, because they do not receive a local visit. This would cause undue risk to Settlements if HH	HH data will only be used in Settlement, where Metering System is traded HH. There is no mechanism for HH data to be traded within the NHH arrangements. There are currently no time trimming requirements for

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			data were used.	NHH, although the intention is to introduce such requirements via CP1253, which hopefully will go out for impact assessment in September.
6	**Energy Services and Technology Association (ESTA)**	5.5.1	The use of the optical port for communication has been downgraded to "may" instead of "preferably shall". Whilst this does not preclude the FLAG port, it does send clear signals to meter vendors that a FLAG port will not be necessary in the future. The FLAG port is being used extensively in the market for both configuration and local reading for backup – both these functions are essential for the integrity of the settlements system. If a FLAG port is not required, what alternative is there to perform these functions? Our understanding is this will be achieved by RF according to ERA specifications, but these have not been defined yet. We do not believe that the process should remove something in the specification that is working well in the industry and replace it for something that does not yet exist. European MID requirements may prevent over-subscription, but this is also being done in many other areas of the specification. It is unlikely that prescribing an optical port would be challenged since it is so well in use currently.	This comment was circulated to the Smart Metering Expert Group to seek their opinions. Responses received suggest that the group would be happy to either reference both British and European standards or to remove any references to standards, on the basis that the only Settlement is that there should be a local interrogation port. Hence the references to standards has been removed and the wording has been amended to: 'An interrogation port shall be provided for each Outstation.' As currently specified, both meters with flag ports and those using RF as envisaged by the ERA would meet Settlement requirements.
7	**Energy Services and Technology Association (ESTA)**		Specifying IEC62056-21 instead of BS EN 61107. Whilst Part 21 is the new equivalent of IEC 1107 (FLAG), we are concerned that this may be misleading to meter vendors. Currently the protocols FLAG and PACT are in wide-spread use and are well-controlled and	This comment has been circulated to the Smart Metering Expert Group to seek their opinions. Responses received suggest that the group would be happy to either reference both protocols or to remove any references to standards, on the basis that

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			understood, as well as being flexible to include new market requirements without change. FLAG is a protocol open to fiscal meter manufacturers, and PACT is proprietary but well published. IEC62056 is primarily DLMS, part of a European group and little used in the UK. It is large, complicated and requires predefinition/approval of new data items to function properly. To use practically it also requires membership of a DLMS User Association. UK vendors are considering to implement HDLC, the low level part of DLMS, which improves communications speed and is more appropriate for most streaming and packet communication methods, but not the full DLMS, which would be over-specified and costly.	the only Settlement is that there should be a local interrogation port. Hence the references to standards has been removed and the wording has been amended to: 'An interrogation port shall be provided for each Outstation.' As currently specified, both meters with flag ports and those using RF as envisaged by the ERA would meet Settlement requirements.
8	**Energy Services and Technology Association (ESTA)**	5.5.2	We are concerned that the suitability of metering / communications equipment is at the discretion of the panel "Media agreed by the panel" – there should be clear performance criteria that can be independently evaluated against	Comment noted. The CoP 10 wording is identical to that used in CoP 5, so the absence of performance criteria is not an issue specific to this Change Proposal, but rather a more general one.
9	**Energy Services and Technology Association (ESTA)**	DCP00033 Attachment E 3.5, 4.6	We are concerned about the removal of proving, and also we understand technical assurance. CT/VT ratios are not the only area where metering errors can occur. For example reading the wrong measurement value, the wrong date/time stamped data, channel number, reading in display sequence, etc. Protocol approval will pick up system bugs which could be compounded, but won't pick up procedural errors (setting up) which can also be	Technical Assurance has never been applied to sub-100kW sites, so DCP0033 is not introducing a change there. There will still be requirements around remote reading assurance for AMR. It is only the formal Proving test requirements that will no longer be required. There will a natural incentive to ensure that AMR meters are set up correctly and can be read

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			compounded. It may dangerous to use the assumption that Cop10 only needs to be as well assured as current NHH meters, because with AMR:- i) HH data is real rather than profiled ii) the customer often calls in with reads against estimates, checking the bill at the same time – this provides a useful common-sense check that an AMR system will not check	remotely. Failure to do so will mean repeated site visits, which will undermine the business case for AMR. Customer checking of bills is likely to continue.
10	**Energy Services and Technology Association (ESTA)**	5.4	Passwords – these appear to be replaced by something else, although it is not clear what this is. Currently customers wishing to read their own data may do so if the Supplier provides them with a simple Level 1 password. We believe any new system of security should not make this process more complicated or arduous for the customer.	Passwords aren't being replaced by something else. CoP 10 is moving away from specifying how security is implemented, to specifying that a security regime should exist. In the short term, the current security regimes using levels and passwords will prevail. In the longer term, the ERA work envisages security potentially being implemented by other means. Settlement requirements shouldn't constrain how security is delivered, but should ensure that security is delivered.