
Meeting name	BSC Panel
Date of meeting	13 January 2005
Paper Title	SSMG ISSUE 13: 'CODES OF PRACTICE APPLICABLE TO METERING SYSTEMS'
Purpose of Paper	For Information
Synopsis	This paper documents the discussions and conclusions of the Settlement Standing Modification Group with regard to Issue 13, and seeks to inform the Panel of its recommendations.

1. BACKGROUND

- 1.1 The Association of Meter Operators (AMO) submitted a paper (SVG/45/001, Reference 1) to the SVG Meeting on 2 November 2004 (Minutes of Meeting 45, Reference 2), inviting the SVG to progress changes to the Code necessary to improve the accuracy and substance of the reporting of Metering System non-compliances. Two particular areas of concern were raised by the paper:
- a) The issue of a Code of Practice (CoP) to which a Metering System must comply; and
 - b) The information to be provided on Meter Certificates.
- 1.2 In relation to the paper submitted by the AMO, the SVG:
- AGREED that the Change Management process should be used to address the long-term solution to the highlighted difficulties;
 - AGREED that a Standing Issue should be raised by a BSC Party to a Standing Modification Group; and
- 1.3 The SVG also stated that other relevant metering matters should be dealt with in the Change Management process. Issue 13 was raised to deal with these matters and point a) above, whilst point b) will be discussed in a separate review of CoP 4. This review has yet to be initiated. More details of these other matters can be found in Section 3.2 of this document.

2. DESCRIPTION OF ISSUE

- 2.1 Issue 13 'Codes of Practice applicable to Metering Systems' was raised by Gaz de France ('the Proposer') on 22 November 2004. Issue 13 identifies a situation whereby Metering Systems are installed according to the CoP current on the installation date, but the Code requires subsequent technical audits to be carried out by the Technical Assurance Agent (TAA) according to the CoP current at the time of first registration.
- 2.2 The SSMG and the Chairman of the AMO met on 13 December 2004 to discuss Issue 13, and this paper provides a summary of the discussions and recommendations to the Panel made at that meeting. Annex 1 lists the attendees of this meeting.

- 2.3 This issue relates to Metering Systems installed prior to the 1998 changes to the Electronic Registration System (ERS), as new Metering Systems are now registered under a Supplier at or about the time of installation. However, Metering Systems under the old ERS were installed according to the relevant CoP, and registered perhaps a few years later. The CoP may have been updated in the meantime, such that the version of the CoP current at the time of registration may contain different requirements to the version of the CoP current at the time of installation.
- 2.4 This was not a problem under the ERS as audits were performed according to the relevant CoP on the installation date. However, the Trading Arrangements implemented in 1998 required that Metering Systems be audited according to the relevant CoP on the date of first registration.
- 2.5 Metering Systems that were installed pre-1998 but registered post-1998 (and where the relevant CoP had changed) are thus at risk of non-compliances being raised against them during an audit, as they were not designed to comply with that version of the CoP current at the time of first registration. Two other factors contribute to the situation:
- Registration was not mandatory under ERS whereas it is under the current arrangements; and
 - 1st Tier¹ customers under ERS were de-registered from their first registration date, i.e. the installation date, because the ERS database became over-populated.

The current registration system in place is the Supplier Meter Registration System (SMRS).

- 2.6 The AMO asked the Settlement Standing Modifications Group (SSMG) to note that Meter Operator Agents are judged on performance indicators such as non-compliances and therefore strive to reduce the number of non-compliances raised against them. The AMO believes that the TAA is raising non-compliances that have little material risk associated with them.

3. SSMG DISCUSSIONS

- 3.1 The SSMG recognised the difficulties regarding the installation/registration date of Metering Systems, and that non-compliances were being raised unnecessarily by the TAA.

- 3.2 The following defects were also discussed:

3.3 Recording of First Registration for Settlement

Section L of the Code states that the relevant CoP in respect of any Metering Equipment shall be the one that is applicable at the time the Metering System was first registered for the purposes of Settlement.

- 3.4 The Code anticipates that the Metering System is registered for the purpose of Settlement; this is not the case in the Supplier Volume Allocation (SVA) market, where only the Supplier, and not the Metering System, is registered. The SMRS does not record first registration of the Metering

¹ 1st Tier customers under ERS were those who installed the Metering System and registered on the installation date ('first registration'), but had no Supplier. 2nd Tier customers were those who followed the same installation/first registration procedure, but they also had a Supplier. Note that the Supplier could register the Metering System some time after installation.

System' in the way the Code refers to it, rather the SMRS holds SVA Metering System Numbers (MSIDs) and information about Supplier registration, appointments and energisation status. The SSMG recognised that the current wording of the Code may be misleading.

3.5 Material Change

At present, if a 'material change' takes place on part of a Metering System, then any non-regulatory equipment on that part must be brought up to date. There are two issues:

- The criteria for a material change are vague and contradictory; and
- A definition of a material change may be easier to implement in the relevant CoPs rather than the Code (and vice-versa).

The SSMG noted the difficulties associated with a material change and considered that further definitions be included either in the Code or the relevant CoPs.

3.6 Technical Assurance Sample

The TAA is required to establish a relative sample of all the Metering Systems in the Transmission System in order to audit them. The Code (Section L7.3.3 (c)) requires that the sample should be representative of:

- The Meter Operator Agent;
- The Type of Metering Equipment;
- The CoP;
- The Registrant;
- The GSP Group (for SVA Metering Systems); and
- Any previous inspection(s).

3.7 "Type of Metering Equipment" is not a readily identifiable term and therefore is not used in the sampling process. The term "Metering Equipment" includes meters, measurement transformers (voltage, current or combination units), communications equipment etc. To meet the sampling requirements in this area, the TAA would need all the data about a Metering System before the sample is selected and the MOA would have to supply technical details for all 90,000 (approximate) Metering Systems. The SSMG recognised that this would be an added burden on Parties and Party Agents, and that the Code may need amending in order to reflect a realistic sample.

3.8 Non-Compliance Criteria

The TAA finds a Metering System non-compliant, after taking into account any Dispensations, if either or both of the following apply:

- The requirements of the Code and relevant CoPs are not being adhered to; and

- The configurable meter parameters are not consistent with the Meter Technical Details supplied by the Registrant.

However, the wording of the Code implies that both of these need to be fulfilled for a non-compliance to be raised; this is not consistent with operational practice. The SSMG noted that the current wording may be misleading.

4. SSMG CONCLUSIONS

- 4.1 The SSMG concluded that a single Modification should be raised by a BSC Party in order to address the points raised in Issue 13.
- 4.2 The SSMG concluded that no further meetings were necessary.

5. SSMG RECOMMENDATIONS

- 5.1 The SSMG recommends that a single Modification should be raised by a BSC Party in order to address the points raised in Issue 13.**
- 5.2 The SSMG recommends that no further meetings take place.**
- 5.3 The SSMG recommends that the Panel notes the discussions and conclusions of the SSMG in relation to Issue 13.**

David White

ELEXON Change Delivery

References

Reference 1: Non-Compliances Issued by TAA; Paper submitted by AMO to SVG
http://www.elexon.co.uk/documents/BSC_Panel_and_Panel_Committees/SVG_Meeting_2004_-_045_-_Papers/045_001.pdf

Reference 2: Minutes of SVG Meeting 2 November 2004-12-14
[http://www.elexon.co.uk/documents/BSC_Panel_and_Panel_Committees/SVG_Meeting_2004_-_045_-_Minutes/SVG45_Minutes_\(final\).pdf](http://www.elexon.co.uk/documents/BSC_Panel_and_Panel_Committees/SVG_Meeting_2004_-_045_-_Minutes/SVG45_Minutes_(final).pdf)

Reference 3: Issues Register
http://www.elexon.co.uk/documents/Change_and_Implementation/Modifications_Process_-_Standing_Modification_Group/Issues_Register_041124.pdf

ANNEX 1 – ATTENDEES OF ISSUE 13 MEETING

This table provides details of those present at the Issue 13 meeting on 22 November 2004.

ATTENDEE	ORGANISATION	E-MAIL
Keith Campion – Chairman	ELEXON	keith.campion@elexon.co.uk
Dave White – Lead Analyst	ELEXON	david.white@elexon.co.uk
Isabel Moss – Technical Assurance	ELEXON	isabel.moss@elexon.co.uk
Rob Smith	AMO	rob.smith@metering- services.co.uk
Steve Drummond (SSMG)	EDF Trading	steve.drummond@edftrading.com
Graham Fowles	Ofgem	Graham.Fowles@ofgem.gov.uk