

Assessment Consultation Responses: P283 'Reinforcing the Commissioning of Metering Equipment Processes'

Consultation issued on 17 April 2013

We received responses from the following Parties

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase

Company	No BSC Parties / Non-Parties Represented	Role of Parties/non-Parties represented
RWE npower	9/0	Supplier and Party Agents
Northern Powergrid	2/0	LDSO
Electricity North West Limited	1/0	Distributor
TMA Data Management Ltd	0/1	HHDC, HHDA, NHHDC, NHHDA
IMServ Europe Ltd	0/5	HHDC and DA, NHHDC and DA, MOP
E.ON UK	9/0	E.ON Energy Plc – EELC, EENG, EMEB, NORW, PGEN E.ON NHHDC – EMEB, NORW E.ON NHH Meter Operator - MIDE, EMEB
UK Power Networks	4/0	LDSO
SSE	3/0	Supplier
IBM UK Ltd for and on behalf of ScottishPower Group	7/0	Supplier/Generator/Trader/ Consolidator/Exemptable Generator/Distributor
British Gas	1/0	Supplier
EDF Energy	10/0	Supplier/Party Agent/ Generator/Consolidator/ Exemptable Generator/Trader

Question 1: Would implementation of Modification P283 impact your organisation?

If so, please describe the impacts directly related to implementation, including estimates of associated costs and timescales if possible.

Summary

Yes	No
9	2

Responses

Respondent	Response	Rationale
RWE npower	Yes	Implementation of MOD P283 would have a positive impact on the quality of commissioning of Metering Equipment. As it's the MOA contact details (typically their telephone number) on the meter, any queries/issues in regards to suspected errors are directed to the MOA. Therefore, any change that provides improved confidence in the metering system should be viewed as a positive thing.
Northern Powergrid	Yes	Northern Powergrid would be impacted if P283 was to be approved. Implementation of this Modification would mean we would need to modify our internal processes, and amend our responses to the Registrant. We have no identified costs at present and we are satisfied that we would meet the recommended lead time of 12 months.
Electricity North West Limited	Yes	P283 would impact our organisation as it provides clarity on the activities we as a Distributor carry out, although the impact is negligible since we already carry out these activities in line with the clarification.
TMA Data Management Ltd	No	-
IMServ Europe Ltd	Yes	Yes. IMServ currently does as much commissioning as it can, but it doesn't notify anyone where it's not possible to complete it fully (as there's no current requirement to do so). IMServ also requests measurement transformer test certificates from DNOs (where appropriate), but again doesn't notify anyone where they are not provided – and things like the overall accuracy can't be confirmed.
E.ON UK	Yes	Amended/new procedures will be required as both Supplier and MOA to ensure that the revised requirements of CoP4 are met.

Respondent	Response	Rationale
UK Power Networks	Yes	<p>The placing of a direct obligation on the Equipment Owner to conduct tests of metering CTs, VTs, Testing Facilities and wiring in between would be a completely new obligation that has not previously been placed in any form on the Equipment Owner.</p> <p>To varying degrees changes will be required, to tooling, training and procedures for either contracted services procured by LDSOs or activities conducted by LDSO staff. A significant impact does arise, which we have not yet quantified. A significant lead time to implementation would in any event be required.</p> <p>There are uncertainties in the area of Competition in Connections, that we feel need further consideration. Specifically new distribution equipment is constructed at the request of a third party and potentially at the time of construction may not have been adopted by the LDSO, i.e. the LDSO is not yet the Equipment Owner.</p> <p>Some further consideration of Embedded Metering Points within licence exempt distribution networks could usefully be considered, specifically how the parties determine when the LDSO has no obligation to provide testing or certification.</p>
SSE	No	-
IBM UK Ltd (ScottishPower)	Yes	<p>While ScottishPower already perform majority of the activities, P283 will impact differently on different part of the businesses, in particular, it will require reinforcement of contract with our agents for the obligated activities and changes to internal processes and procedures.</p> <p>As the current P283 solution is not prescriptive, there is no system impact. However, if any data flow or fixed format form requirements were to be proposed (at a later date if appropriate), We would expect these be progressed through the normal CP impact assessment route.</p> <p>It is difficult to estimate costs for these obligations but we do not expected them to be significant. We believe a timescale of 6 month notice is sufficient.</p>
British Gas	Yes	Potential additional costs in ensuring metering equipment is tested and commissioned and appropriate test certificates kept by equipment owners who are not BSC parties.
EDF Energy	Yes	As a supplier, EDF Energy would welcome the

Respondent	Response	Rationale
		<p>changes proposed by P283. It should reduce occurrences of metering inaccuracy due to Metering Equipment which has not been accurately configured at commissioning. These can present a risk to the accuracy of data entering settlement, and impact customer billing, and can remain undetected for considerable time. Reducing such occurrences would reduce the associated risk and administrative overheads of resolving issues long after the event.</p> <p>The registrant, a Supplier in the case of an SVA metering system registered in SMRS, is ultimately responsible under the BSC for ensuring that metering equipment is properly commissioned, even though appointed Party Agents usually perform much of the work. However, where this includes the installation of measurement transformers (CTs and VTs), work is often carried out by network operators or contracted agents, sometimes before appointment of a Meter Operator and installation of a meter. Network operators or third parties are often the relevant Equipment Owner (ie. not the registrant) for measurement transformers and in such capacity alone may not be directly subject to BSC obligations.</p> <p>P283 seeks to place explicit obligations on those "Equipment Owners" who are BSC Parties, to comply with BSC Codes of Practice in relation to the equipment, including provision of CT/VT certificates and commissioning records to the Registrant's Meter Operator, to assist the registrant in achieving and demonstrating compliance. Other proposed changes to CoP4 explicitly require the Meter Operator to advise the registrant of full and successful commissioning, or of issues which require attention. In the latter case, the Registrant is required to consider the issues and appropriate steps to be taken, with the relevant meter operator and/or network operator (/Equipment Owner) where necessary.</p> <p>Reinforcing the obligations for commissioning new equipment should improve the provision and accuracy of site technical details, particularly for CT/VT measurement transformers, in turn this should reduce metering inaccuracies, Trading Disputes and TAA non-compliances.</p> <p>As a meter agent, the implementation of P283 will not significantly impact our organisation. The changes will make our processes easier, and reduce the risk of involuntary BSC non-compliance.</p>

Question 2: Do you agree the BSC legal text and CoP4 redlining delivers the P283 solution?

Summary

Yes	No	Other
10	0	1

Responses

Respondent	Response	Rationale
RWE npower	Yes	<p>The current redlining of CoP4 ('SCOPE' section, page 7 - below) appears to indicate that further change may be warranted to allow for an efficient process by which an MOA can report successful or unsuccessful commissioning to a registrant. In all likelihood this is best achieved via a DTC change rather than an underpin process.</p> <p><i>'In the case of Half Hourly Metering Equipment it shall be the responsibility of the MOA to notify its Registrant, via an auditable, electronic method, that either:</i></p> <ul style="list-style-type: none"> <input type="checkbox"/> <i>All items of Metering Equipment have been fully and successfully Commissioned in accordance with thisCoP4; or that</i> <input type="checkbox"/> <i>There are defects or omissions in the completion of the processes set out in this CoP4 which have the potential to affect Settlement. Such notification shall include details of any defects or omissions identified and an assessment of the potential implications for the Registrant, customer and network operator. Where such notification is provided and the Registrant believes that there is a risk to Settlement it shall, in accordance with Section L3.6 of the BSC, consult with the relevant network operator and agree the appropriate steps to be taken to minimise the risks to Settlement. Such agreements shall be recorded and be made available on request to the BSC Panel.'</i> <p>In section 5.3.1 in the CoP4 redline (below) leaves the obligation on the MOA to ensure the operation of CT/VTs where the owner is not a BSC party. A better way of dealing with this scenario might be to place an obligation on the DNO or network provider to obtain the relevant information from the owner before allowing connection to their respective networks. This could then be passed to the MOA (as it would be if the owner was a BSC party).</p> <p><i>5.3.1 Responsibility for Calibrations and maintenance</i></p>

Respondent	Response	Rationale
		<p><i>of Records.</i></p> <p><i>Where measurement transformers are owned by a BSC Party that Party shall be responsible for ensuring the requirements of 5.3, are performed up to and including the Testing Facilities. In addition that Party shall prepare, and make available to the appointed MOA, complete and accurate calibration records in relation to these obligations. Where measurement transformers are not owned by a BSC Party the Registrant, via its appointed MOA, shall be responsible for these requirements.</i></p> <p>We are also unsure why NHH commissioning is excluded? Although the volumes are lower there are CT and even VT operated sites within this market.</p>
Northern Powergrid	Yes	We believe the text accurately reflects the solution.
Electricity North West Limited	Yes	The BSC legal text and CoP4 redlining delivers the P283 solution because it clarifies who has the responsibility for carrying out the activities.
TMA Data Management Ltd	Yes	-
IMServ Europe Ltd	Yes	Yes.
E.ON UK	Yes	N/a
UK Power Networks	Yes	<p>We would have preferred that the Commissioning Tests expected of the Equipment Owning BSC Party had been separately listed, independent of bulleted test requirements listed in section 5.5.2, for complete clarity but we understand why the group elect to simplify drafting.</p> <p>Despite the new wording in section 5.3.1, which references obligations of the equipment owning BSC Party to comply with section 5.3, it is not clear precisely which of the bulleted test requirements in section 5.5.2 apply to the LDNO equipment owner, specifically as the cross reference from section 5.3 to section 5.5 does not exist.</p> <p>In respect of the bulleted test requirements listed in section 5.5.2;</p> <ol style="list-style-type: none"> 1. The first two bulleted test requirement can clearly be applied to the Testing Facilities. 2. The third bulleted test requirement arguably only relates to the Metering Terminals and is not clear

Respondent	Response	Rationale
		<p>that the test is expected to be applied at the Testing Facilities.</p> <p>3. It would appear that none of the fourth to eighth bulleted test requirements are expected to be applied to the Testing Facilities by the LDNO equipment owner but this is not expressly stated.</p>
SSE	Yes	-
IBM UK Ltd (ScottishPower)	Yes	The proposed redlinings on the documents appear appropriate.
British Gas	Yes	Yes
EDF Energy	Yes/No	<p>The proposed revision to BSC section L3.6.1 divides the section into two parts, (a) and (b). In making this division, the activity "that the Metering Equipment shall be commissioned" is not included in new sub-paragraph (b). It should be included either in the initial sentence of L3.6.1, or repeated in (b).</p> <p>We note that the proposed change to BSC Section J1.2.2(a) explicitly removes certain activities from the responsibility of a Meter Operator Agent in certain circumstances, while proposed changes to CoP4 might alter some of the activities of Meter Operator Agents in relation to measurement transformers and commissioning of Half-Hourly metering systems.</p> <p>In proposed revisions to CoP4:</p> <ul style="list-style-type: none"> At foot of page 1, under Scope, the inclusion of "i.e. the relevant network operator" should say ", for example a relevant network operator", because other scenarios not affecting network operators are possible. The proposed addition of a definition for "Testing Facilities" makes reference to Appendix C of the relevant CoP. However, not all CoPs refer to Testing Facilities in Appendix C, and the exact terminology varies from CoP to CoP, with nothing for CoP6&7. We suggest simply saying "as set out in the relevant CoP". (CoP1&2 refer to the Testing Facility in section 5 (eg. 5.2), and Appendix C refers simply to a Test Facility. CoPs 3&5 describe "Testing Facilities" in section 5 and Appendix C. CoPs 6&7 appear to make no reference to testing or a Test Facility, and although including references to CT/VT measurement transformers, appear to be written entirely for whole current metering (eg. see Section 6.1 of CoP6, 5.4 of CoP7). CoP 10 refers

Respondent	Response	Rationale
		to Test Facilities and Testing Facilities at section 5.2, but has no Appendix C.)

Question 3: Do you agree with the Workgroup's proposed implementation approach for P283?

Summary

Yes	No
11	0

Responses

Respondent	Response	Rationale
RWE npower	Yes	This will require change to existing process both in the field and office and 12 months from approval seems reasonable.
Northern Powergrid	Yes	As per the above we agree with the proposed implementation approach.
Electricity North West Limited	Yes	Implementation to be 12 months after approval provides sufficient time to hold participant workshops to develop the CoP4 Guidance.
TMA Data Management Ltd	Yes	-
IMServ Europe Ltd	Yes	Yes.
E.ON UK	Yes	N/a
UK Power Networks	Yes	We have concerns as to whether 12 months is a long enough period, considering the consequential alterations to contractor and staff related processes, introducing entirely new requirements and also in respect of further burdens upon Independent Connections Providers (setting out requirements and ensuring ICP compliance)
SSE	Yes	-
IBM UK Ltd (ScottishPower)	Yes	ScottishPower believes that P283 should be implemented as early as possible and wishes that it could be implemented quicker than 12 months, but acknowledging that its impact on parties, the need for a robust auditable trail and the development of the guidance documents may take some time. We nonetheless hope that the Workgroup reconsiders the implementation lead time after responses from the

Respondent	Response	Rationale
		industry.
British Gas	Yes	-
EDF Energy	Yes	Yes, 9 - 12 months notice following a decision is easily sufficient time for EDF Energy to implement the proposed changes.

Question 4: Are there any alternative solutions that the Workgroup has not identified that it should consider?

Summary

Yes	No
1	10

Responses

Respondent	Response	Rationale
RWE npower	No	Not that we are aware of.
Northern Powergrid	No	N/A
Electricity North West Limited	No	-
TMA Data Management Ltd	No	-
IMServ Europe Ltd	No	No.
E.ON UK	Yes	<p>Section 5.3.1 of the new CoP4 wants the MOA to carry out the commissioning tests where the LDSO is not the Equipment Owner, but the whole point of this exercise is that the MOA can't do that a lot of the time, so this doesn't really fix the issue. We agree the responsibility should pass back to the registrant but with some sort of agreement in place that the local LDSO can provide a suitably qualified engineer to carry out the work if the MOA aren't able to? Even if it's at a cost.</p> <p>Also when we refer to Equipment Owners who are not a BSC Party, does this refer solely to customers who own their own equipment or could this include companies subcontracted by the LDSO to install transformers/switchgear? A situation could arise where the LDSO could defer responsibility back to the registrant?</p>

Respondent	Response	Rationale
UK Power Networks	No	No comment
SSE	No	-
IBM UK Ltd (ScottishPower)	No	-
British Gas	No	-
EDF Energy	No	-

Question 5: Do you agree with the Workgroup's view that P283 is not suitable for determination as a Self-Governance Modification?

Summary

Yes	No
11	0

Responses

Respondent	Response	Rationale
RWE npower	Yes	We support the Workgroup's view that the change to participants obligations means that P283 is not suitable for progression as a Self-governance Modification Proposal.
Northern Powergrid	Yes	N/A
Electricity North West Limited	Yes	As there is a change to participants' obligations then P283 is not suitable for self governance.
TMA Data Management Ltd	Yes	The change in ownership of responsibilities from MOA to Registrants/Asset owners prevent this Modification from being a Self-Governance Modification
IMServ Europe Ltd	Yes	Yes, self-governance doesn't appear to have worked in the past.
E.ON UK	Yes	N/a
UK Power Networks	Yes	No comment
SSE	Yes	-
IBM UK Ltd (ScottishPower)	Yes	As P283 potentially have significant impact on the Network business, it does not meet the criteria for self-governance.
British Gas	Yes	-

Respondent	Response	Rationale
EDF Energy	Yes	Given the potential impact on BSC Parties and Party Agents, this Modification does not appear to meet the criteria for Self-Governance.

Question 6: Would Proposed Modification P283 better achieve the Applicable BSC Objectives compared with the current baseline?

Summary

Yes	No
11	0

Responses

Respondent	Response	Rationale
RWE npower	Yes	We believe that P283 would better facilitate Objective b (as it would improve the accuracy of metered volumes), Objective c (because it would increase confidence in the Settlement and commissioning process) and Objective d (because data entering Settlement would be improved).
Northern Powergrid	Yes	N/A
Electricity North West Limited	Yes	P283 better achieves objectives B and D because if the meter has been commissioned correctly and the responsible participant has met their obligation then it should improve the accuracy of the settlement data and promote effective operation of the Distribution network
TMA Data Management Ltd	Yes	It would better deliver objective d, by improving the quality of the data going into settlement.
IMServ Europe Ltd	Yes	Yes.
E.ON UK	Yes	BSC objective B would be better achieved as this modification should decrease number of mismatches of installed CT and VT ratios and those ratios held by party agents which then impacts on settlement.
UK Power Networks	Yes	We agree that to the extent the change makes it more likely that key tests are completed, where the MOA has to date been unable to do so, that in the round BSC Objectives are more likely to be met.
SSE	Yes	-
IBM UK Ltd	Yes	ScottishPower believes that P283 would better achieve

Respondent	Response	Rationale
(ScottishPower)		<p>the Applicable BSC Objectives (c) and (d) for the following reasons:-</p> <ul style="list-style-type: none"> Clarifies obligations and responsibilities on individual groups of parties - better facilitates BSC Objective (c). Reduces settlement inaccuracies and risk to BSC parties - better facilitates BSC Objective (c). Reduces settlement risk and TAA non-compliances - better facilitates BSC Objective (d).
British Gas	Yes	-
EDF Energy	Yes	<p>Increasing the onus for providing accurate commissioning data on the parties that have that information can only improve the commissioning process and reduce incidents of inaccurate meter configuration and resulting meter data inaccuracy.</p> <p>The accuracy of metered data allocated to parties in Settlement would be improved under P283, thus better meeting BSC Objective (c) concerning effective competition.</p> <p>Reduction in the number of errors in meter data would reduce the administrative cost of processing disputes and correcting data retrospectively, thus better meeting BSC Objective (d).</p> <p>If the same kind of measurement errors which the proposal seeks to avoid currently affect operational metering used by network operators, the proposal could have a positive impact on BSC Objective (b) concerning operation of the transmission system.</p>

Question 7: Do you have any further comments on P283?

Summary

Yes	No
3	8

Responses

Respondent	Response	Rationale
RWE npower	Yes	<p>We believe that changes to the DTC may need to be considered in parallel with this MOD. In order for an efficient feedback process to be implemented, a common industry approach is necessary and we feel this would be best provided by dataflows. This in turn would require changes to BSCP 06, 514 and</p>

Respondent	Response	Rationale
		potentially 515.
Northern Powergrid	No	N/A
Electricity North West Limited	No	-
TMA Data Management Ltd	No	-
IMServ Europe Ltd	Yes	<p>We fully support this change as approximately 20% of our portfolio is HV metering and thus prone to the difficulties which this modification seeks to resolve. There will also be a number of LV CT meters (<400/5 in ACB equipment) which we will also have difficulty accessing. As an independent Mop the task of commissioning the CT equipment housed in the Host DNO's equipment is difficult to carry out due to access and authorisation issues.</p> <p>It not clear to us however as to how this is going to work with regard to the historical issue of measurement transformer test certificates which have been lost or destroyed due to business reorganisation.</p> <p>The modification states that it is not retrospective, however every time a meter is changed it needs to be commissioned in accordance with the new requirements in CoP4. As a MOP, IMServ is pleased the new wording for CoP 4 makes it clear the responsibility to provide measurement transformer test certificates lies with the DNO. However from an industry perspective this is a case of moving the problem elsewhere rather than dealing with it. It doesn't matter who has the responsibility to provide a test certificate - if it's lost the process will still fail.</p>
E.ON UK	No	N/a
UK Power Networks	No	No comment
SSE	No	-
IBM UK Ltd (ScottishPower)	No	-
British Gas	No	-
EDF Energy	Yes	Where the equipment owner is not a BSC Party, it may remain difficult to ensure that the correct commissioning data is provided. Where subsidiaries

Respondent	Response	Rationale
		or affiliates of BSC Parties are owners of equipment, the proposal may have limited effect.