

CP1429 'Proving test timescales'



Contents

1	Why Change?	2
2	Solution	3
3	Impacts and Costs	4
4	Implementation Approach	5
5	Initial Committee Views	5
6	Industry Views	6
7	Final Committee Views and Decision	8
	Appendix 1: Glossary & References	9

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About This Document

This document is the Final Change Proposal (CP) Report for CP1429 which ELEXON has published following the final decision from the Supplier Volume Allocation Group (SVG) to approve CP1429.

There are four parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, and proposed implementation approach. It also summarises the SVG's views on the proposed changes and the views of respondents to the CP Consultation, along with the final decision on whether to approve this change.
- Attachments A and B contain the approved redlined changes to deliver the CP1429 solution.
- Attachment C contains the full responses received to the CP Consultation.

1 Why Change?

Background

CP1411 'Remove Exemption from Proving Tests for Code of Practice 10 Metering Systems' removed the exemption from proving tests for [Code of Practice \(CoP\) 10 'Metering of Energy via Low Voltage Circuits for Settlement Purposes'](#) Metering Systems in [BSC Procedure \(BSCP\) 514 'SVA Meter Operations for Metering Systems Registered in SMRS'](#). It therefore made proving tests mandatory for all Half Hourly (HH) Metering Systems.

What is the issue?

The CP1411 consultation identified that the table in section 8.3.5 of BSCP514 needs an entry relating to CoP10, detailing the timescales for proving tests.

In addition, a problem with proving test timescales has since been identified by ELEXON in relation to the BSC Audit. BSCP514 section 8.3.5 currently states that:

- "the maximum timescale between the initiation of a proving test as a result of the circumstances in 8.3.1 and the successful completion of the proving test by the HH Meter Operator Agent (MOA) (by sending the D0214 'Confirmation of Proving Tests' data flow) to the HH Data Collector (DC) is listed below for each CoP".

This is qualified by footnote 79 which states that:

- "the starting date for this time is either the Date of Meter Installation, the Effective From Date of the Meter, the Effective Date of a Change of Agent as described in Section 8.3.1, or the date when a Metering System becomes energised where there has been a key field change whilst the Metering System was de-energised, whichever is the later".

BSCP514 sections 5.5.1 to 5.5.4 allow for a proving test to be carried out "following installation/reconfiguration, commissioning and once HH Metered Data retrieved". Section 5.5.3.1 footnote 46 allows commissioning to "be deferred if load is not available at that time". Therefore, if commissioning and proving are deferred as a result of lack of load (and where injection testing cannot reasonably be carried out by the MOA) the MOA will be unable to comply with the proving test timescales.

Approved solution

[CP1429 'Proving test timescales'](#) will make the following changes:

- Add proving test timescales for CoP10 Metering Systems to section 8.3.5 of BSCP514. This will ensure that proving tests are carried out in a timely manner for CoP10 Metering Systems once the exemption is removed by CP1411. As CP1411 is being implemented in the June 2015 Release, we propose that CP1429 should also be implemented in this release.
- Amend BSCP514 section 8.3.5 footnote 79 to include the commissioning date in the list of trigger events. This change modifies a requirement that MOAs cannot meet when there is insufficient load for a new connection to carry out commissioning and a proving test.

Proposer's rationale

[P272 'Mandatory Half Hourly Settlement for Profile Classes 5-8'](#) has an approved Implementation Date of 1 April 2016. Metering Systems in Profile Classes (PCs) 5 to 8 with advanced Meters will be subject to a Change of Measurement Class (CoMC) by the P272 Implementation Date. A CoMC is a trigger for proving tests, so high numbers of CoP10 Metering Systems will be subject to proving tests during 2015/16.

Approved redlining

The approved redlined changes to BSCP514 to deliver CP1429 can be found in Attachment A. Following CP Consultation, it was identified that similar changes are also required to BSCP502. These can be found in Attachment B.

3 Impacts and Costs

Central impacts and costs

Central impacts

CP1429 will require updates to BSCP502 and BSCP514 to implement the approved solution. No system changes will be required for this CP.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none">BSCP502BSCP514	<ul style="list-style-type: none">None

Central costs

The central implementation costs for CP1429 will be approximately £240 (one ELEXON man day) for ELEXON to implement the relevant document changes. There are no BSC Agent costs or impacts.

BSC Party & Party Agent impacts and costs

Participant impacts

CP1429 will impact Suppliers, HHMOAs and HHDCs. Seven of the nine respondents indicated that they would be impacted as a result of implementing CP1429. Respondents commented that this impact would involve minor changes to systems and current processes. However, with the approaching Implementation Date of P272, respondents were concerned with the volume of Meters moving from Non Half Hourly (NHH) to HH and the corresponding volume of proving tests.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
Suppliers	Changes will be required to implement the solution.
HHMOAs	
HHDCs	

Participant costs

Four of the nine respondents to the CP Consultation indicated that there would be costs associated with CP1429. These respondents commented that although the implementation of CP1429 itself would involve minor costs, its impact would add significant proving costs to the proposed transfer of customers from NHH to HH as result of the implementation of P272. The same respondents highlighted that the volume of these transfers will be extremely high (several hundred or thousand per day) so additional resource will be required and this will subsequently increase costs.

The remaining five respondents did not identify any costs associated with CP1429.

4 Implementation Approach

Approved Implementation Date

CP1429 has been approved for implementation on **25 June 2015** as part of the June 2015 BSC Systems Release.

Proving test timescales for CoP10 Metering Systems will be needed in support of CP1411, which has been approved for implementation as part of the June 2015 Release. We therefore proposed that CP1429 should also be implemented in this Release.

Six of the nine respondents to the CP Consultation agreed with the Implementation Date for CP1429, so that it is aligned with the implementation of CP1411. However, two respondents disagreed. They commented that due to the unknown transition profile of CoP10 Meters for the P272 migration, it would be extremely difficult to also complete proving tests in line with CoP5 Meters during this time.

Another respondent agreed that MOAs may struggle to adhere to the 15 Working Day (WD) timescales to process the flows. They suggested that an obligation be placed on the HHDC to respond to a D0005 'Instruction on Action' data flow within 2WDs in order to provide the MOA with time to complete its processes. They believed that this would mitigate the risk for HHDCs because, as proposed, the HHDC could send the D0003 'Half Hourly Advances' data flow on day 14. This would make them compliant but would leave the MOA no opportunity to respond within the 15WDs. ELEXON acknowledged the respondent's concern, but noted that this would also have been a problem for CoP5 Metering Systems that were already subject to the proving test process prior to the approval of CP1411 and progression of CP1429.

5 Initial Committee Views

SVG's initial views

The SVG considered CP1429 at its meeting on 3 February 2015 ([SVG168/13](#)). The SVG had no initial comments on the proposed changes.

6 Industry Views

This section summarises the responses received to the CP Consultation. You can find the full responses in Attachment C.

Summary of CP1429 CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1429 proposed solution?	8	1	0	0
Do you agree that the draft redlining delivers the intent of CP1429?	9	0	0	0
Will CP1429 impact your organisation?	7	2	0	0
Will your organisation incur any costs in implementing CP1429?	4	5	0	0
Do you agree with the proposed implementation approach for CP1429?	6	2	0	1
Do you have any further comments on CP1429?	2	7	0	0

Comments on the CP

Eight of the nine respondents to the CP Consultation agreed with the proposed changes for CP1429. Respondents commented that proving tests would add value and reassurance to the process, so it is sensible to agree timescales to align these with other HH CoP Metering Systems.

One respondent who was supportive of the change suggested that the timescales should be 30WD rather than the proposed 15WD. They believe that a 15WD deadline is a disproportionate timescale on MOAs to carry out proving tests for Metering Systems that pose less risk to Settlement than CoP5 Metering Systems. ELEXON agreed that CoP10 Meters have a lower specification and therefore lower risk than CoP5 Meters, but believed that 30WDs is an excessive amount of time to carry out a proving test. It disagreed that a change to the proposed timescales should be made.

Relationship to P272

One respondent disagreed with the proposed changes for CP1429. They commented that they would agree with the proposed timescales of 15WD for proving tests for CoP10 Meters under 'normal' HH installation and CoMC volumes. However, they disagreed with the proposal that all PC 5-8 Meters that have not transitioned to HH Settlement by the June 2015 Release will be included in the current proposed timescales. The respondent was concerned that they will have significantly less than five months from November 2015 to March 2016 to perform a CoMC for these Meters as they are reliant on Suppliers providing this information. Subsequently, they believed there would be a detrimental effect

on achieving the current P272 Implementation Date. ELEXON highlighted that under CP1411 it was agreed that all HH Metering Systems should have a proving test and therefore a CoMC to HH is a trigger for carrying out the proving test¹.

Another respondent also commented that the number of CoMC to be undertaken for PC 5-8 Meters will make it difficult to achieve the Service Level Agreement (SLA) for proving tests. ELEXON highlighted that CP1429 seeks to address the absence of an SLA and that failure to achieve the SLA is a transitional issue from P272. It noted that if P272 is a special circumstance, then it should be addressed as such.

One respondent was concerned that HHDCs and MOAs may feel pressured by the volume of CoP10 Meters that have to be proved to meet the P272 requirements, which may result in agents failing to meet their targets or an increase in errors. They therefore recommended a P272 derogation so that the CoP10 HH proving test timescales be relaxed during the migration period. This would allow MOAs and HHDCs to concentrate their attention on the more essential Meter reconfiguration processes that carry a higher risk.

ELEXON confirmed that the SVG discussed this suggestion at its meeting on 3 February 2015 ([SVG168](#)). The SVG noted that neither the Panel nor the Performance Assurance Board (PAB) has the power to grant derogation from BSC requirements. ELEXON noted that the SVG had discussed a couple of other suggestions that:

- the PAB and the BSC Auditor could be lenient in how it applies its Error and Failure Resolution process during the P272 transition; or
- a BSC Party could raise a CP to vary the requirement during the P272 transition. (The SVG noted that, because this relates to compliance and not a necessary change for Settlement, ELEXON's view is that it would be more appropriate for a Supplier to raise such a CP rather than itself.)

CP1429 is independent of P272 and does not prevent any BSC Party from raising a CP if they want different timescales to apply during the P272 transition.

Comments on the proposed redlining

Respondents to the CP Consultation unanimously agreed that the proposed redlined changes to BSCP514 deliver the intention of CP1429.

Three respondents identified that BSCP502 section 4.6.5 should also be updated to reflect the changes to the timescales to prevent any inconsistencies between the documents. ELEXON agreed that this change is needed and therefore included the identical changes to BSCP502 in Attachment B for approval as part of CP1429.

¹ The SVG approved CP1411 in June 2014 ([SVG160/08](#)).

SVG's final views

The SVG made its decision on CP1429 at its meeting on 31 March 2015 ([SVG170/03](#)).

One SVG Member commented that proving tests are a manual process, and require about 15-20 minutes of effort per test. They considered that there would not be enough time to carry out the 140,000 or so proving tests necessary for the P272 transition ahead of the P272 Implementation Date of 1 April 2016. By approving CP1429, they were concerned that this could result in MOAs being non-compliant for many months as they complete the necessary proving tests. However, the Member noted a CP that they were aware is due to be submitted shortly that would alleviate some of these issues, and because of this was less worried with approving CP1429.

Final decision

The SVG has:

- **APPROVED** CP1429 for implementation on 25 June 2015 as part of the June 2015 BSC Systems Release.

Appendix 1: Glossary & References

Acronyms

Acronyms used in this document are listed in the table below.

Acronyms	
Acronym	Definition
BSC	Balancing and Settlement Code (<i>Industry Code</i>)
BSCP	Balancing and Settlement Code Procedure (<i>Code Subsidiary Document</i>)
CoMC	Change of Measurement Class
CoP	Code of Practice (<i>Code Subsidiary Document</i>)
CP	Change Proposal
CPC	Change Proposal Circular
DC	Data Collector (<i>Party Agent</i>)
HH	Half Hourly
MOA	Meter Operator Agent (<i>Party Agent</i>)
NHH	Non Half Hourly
PAB	Performance Assurance Board (<i>Panel Committee</i>)
PC	Profile Class
SLA	Service Level Agreement
SMRS	Supplier Meter Registration Service
SVG	Supplier Volume Allocation Group (<i>Panel Committee</i>)
WD	Working Day

DTC data flows and data items

DTC data flows and data items referenced in this document are listed in the table below.

DTC Data Flows and Data Items	
Number	Name
D0003	Half Hourly Advances
D0005	Instruction on Action
D0214	Confirmation of Proving Tests

External links

A summary of all hyperlinks used in this document are listed in the table below. All external documents and URL links listed are correct as of the date of this document.

External Links		
Page(s)	Description	URL
2	CP1411 page on the ELEXON website	https://www.elexon.co.uk/change-proposal/cp1411/
2	Code of Practice page on the ELEXON website	https://www.elexon.co.uk/bsc-related-documents/related-documents/codes-of-practice/
2	BSCPs page on the ELEXON website	https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/
3	CP1429 page on the ELEXON website	https://www.elexon.co.uk/change-proposal/cp1429/
3	P272 page on the ELEXON website	https://www.elexon.co.uk/mod-proposal/p272-mandatory-half-hourly-settlement-for-profile-classes-5-8/
5, 7	SVG168 page on the ELEXON website	https://www.elexon.co.uk/meeting/svg-168/
7	SVG160 page on the ELEXON website	https://www.elexon.co.uk/meeting/svg-160/
8	SVG170 page on the ELEXON website	https://www.elexon.co.uk/meeting/svg-170/