

# CP Consultation Responses

## CP1429 'Proving test timescales'



This CP Consultation was issued on 9 February 2015 as part of CPC00753, with responses invited by 6 March 2015.

### Consultation Respondents

| Respondent                   | No. of Parties/Non-Parties Represented | Role(s) Represented                                                                  |
|------------------------------|----------------------------------------|--------------------------------------------------------------------------------------|
| British Gas                  | 1/0                                    | Supplier                                                                             |
| EDF Energy                   | 10/0                                   | Generator, Supplier, Non Physical Trader, ECVNA, MVRNA, Supplier Agent, Consolidator |
| E.ON                         | 1/0                                    | Supplier                                                                             |
| IMServ                       | 0/1                                    | Supplier Agent                                                                       |
| ScottishPower                | 1/1                                    | Supplier, Supplier Agent                                                             |
| Siemens Operational Services | 0/1                                    | Supplier Agent                                                                       |
| SSE Energy Supply Limited    | 1/0                                    | Supplier                                                                             |
| TMA Data Management Ltd      | 0/1                                    | Supplier Agent                                                                       |
| Western Power Distribution   | 4/0                                    | Distributor, Supplier Agent                                                          |

## Summary of Consultation Responses

| Respondent                         | Agree? | Impacted? | Costs? | Impl. Date? |
|------------------------------------|--------|-----------|--------|-------------|
| British Gas                        | ✓      | ✗         | ✗      | ✓           |
| EDF Energy                         | ✓      | ✓         | ✓      | ✓           |
| E.ON                               | ✓      | ✗         | ✗      | -           |
| IMServ                             | ✓      | ✓         | ✓      | ✗           |
| ScottishPower                      | ✓      | ✓         | ✗      | ✓           |
| Siemens<br>Operational<br>Services | ✗      | ✓         | ✓      | ✗           |
| SSE Energy Supply<br>Limited       | ✓      | ✓         | ✗      | ✓           |
| TMA Data<br>Management Ltd         | ✓      | ✓         | ✓      | ✓           |
| Western Power<br>Distribution      | ✓      | ✓         | ✗      | ✓           |

## Question 1: Do you agree with the CP1429 proposed solution?

### Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 8   | 1  | 0                  | 0     |

### Responses

| Respondent                   | Response | Rationale                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|------------------------------|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| British Gas                  | Yes      | -                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| EDF Energy                   | Yes      | We support the change with respect to defining timescales for proving tests to be carried out however we believe that these timescales should be 30 working days rather than 15. The proposed 15 working day 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.                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| E.ON                         | Yes      | Yes, however we are concerned over timescales for the MOP to process flows given potential changes that may result from P272.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| IMServ                       | Yes      | We agreed that proving tests add value and reassurance; it's sensible to suggest that proving tests be performed on all HH traded meters, including COP10. We agree with the proposed timescales for normal business scenarios however believe a dispensation to these should be allowed with regard to the P272 industry requirements (and MPANs).                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| ScottishPower                | Yes      | -                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Siemens Operational Services | No       | Siemens would agree with the proposed timescales of 15WdD + 15WD for Proving Tests for CoP10 meters under normal HH installation and CoMC volumes. We disagree with the proposal of all PC 5–8 meters that have not transitioned to HH Settlement by the 25th June will be included in the current proposed timescales. The Industry has 168,000 PC 5-8 Cop10 meters to transition in less than five months (November 2015 – March 2016) to achieve the implementation date of P272, of which Siemens have a number. Currently we do not know the transition profile for these meters, as we are reliant on the Suppliers for this information. Our concern is that we will have significantly less than five months to perform the CoMC for these meters. We therefore disagree with the implementation of |

| Respondent                 | Response | Rationale                                                                                                                                                                                 |
|----------------------------|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                            |          | CP1429 and CP1411 on 25th June 2015, as there is the possibility they will have a detrimental effect on achieving the current implementation date of P272.                                |
| SSE Energy Supply Limited  | Yes      | Further to the approval to mandate Proving Tests for CoP10 Metering Systems (CP1411), we agree the timescales for Proving need to be aligned with other CoP Half Hourly Metering Systems. |
| TMA Data Management Ltd    | Yes      | -                                                                                                                                                                                         |
| Western Power Distribution | Yes      | -                                                                                                                                                                                         |

## Question 2: Do you agree that the draft redlining delivers the CP1429 proposed solution?

### Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 9   | 0  | 0                  | 0     |

### Responses

A summary of the specific responses on the draft redlining can be found at the end of this document.

| Respondent                   | Response | Rationale                                                                                                                                                                                                                                                                                                                                      |
|------------------------------|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| British Gas                  | Yes      | -                                                                                                                                                                                                                                                                                                                                              |
| EDF Energy                   | Yes      | We believe section 4.6.5 of BSCP502 should also be updated to reflect changes to the timescales.                                                                                                                                                                                                                                               |
| E.ON                         | Yes      | -                                                                                                                                                                                                                                                                                                                                              |
| IMServ                       | Yes      | We agree that the reline changes deliver the desired result. Please note however that similar changes are also required to BSCP502.                                                                                                                                                                                                            |
| ScottishPower                | Yes      | -                                                                                                                                                                                                                                                                                                                                              |
| Siemens Operational Services | Yes      | Siemens agree in principle to the redlining in BSCP514 Section 8.3.5. However its implementation should be delayed until after the implementation of P272 for those meters that are currently installed and are part of the proposed transition for PC 5–8 to HH Settlement, they should be exempt from the requirements of CP1429 and CP1411. |
| SSE Energy Supply Limited    | Yes      | -                                                                                                                                                                                                                                                                                                                                              |
| TMA Data Management Ltd      | Yes      | We agree with the proposed redlining of BSCP514 but would expect a similar redlining for BSP502 4.6.5.                                                                                                                                                                                                                                         |
| Western Power Distribution   | Yes      | -                                                                                                                                                                                                                                                                                                                                              |

## Question 3: Will CP1429 impact your organisation?

### Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 7   | 2  | 0                  | 0     |

### Responses

| Respondent                   | Response | Rationale                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|------------------------------|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| British Gas                  | No       | This change will impact metering agents.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| EDF Energy                   | Yes      | No system changes will be required however there will be operational impact due to the increase in proving tests required for COP10 metering systems.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| E.ON                         | No       | No although we are concerned that 3rd party MOP agents may struggle to adhere to timescales to process flows in the 15 working day timescales.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| IMServ                       | Yes      | At this point the impact to IMServ will be minimal as the volume of CoP10 Meters requiring a proving test is very low, however with P272 approaching we have serious concerns regarding the volume of meters moving from NHH to HH and the corresponding volume of proving tests.                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| ScottishPower                | Yes      | We will require time to amend our current processes to include CoP10 metering in our proving test schedules going forward.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Siemens Operational Services | Yes      | <p>The implementation of CP1429 will impact Siemens in a number of ways:</p> <ol style="list-style-type: none"> <li>1. System changes will be required to our Proving Test Tracking application to include CoP10 meter types. The application will require testing to ensure that CoP10 meters are being correctly tracked and progress reported.</li> <li>2. Recruitment, training and management of temporary staff required to undertake the proving test process for P272 implementation could have an detrimental impact on our standard business standard processes.</li> <li>3. Additional Dialling Software will be required for the Proving team, in addition to the overheads for standard workstation and software package.</li> </ol> |
| SSE Energy Supply Limited    | Yes      | -                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

| Respondent                 | Response | Rationale                                                      |
|----------------------------|----------|----------------------------------------------------------------|
| TMA Data Management Ltd    | Yes      | CP1429 would have a minor impact on our systems and procedure. |
| Western Power Distribution | Yes      | -                                                              |

## Question 4: Will your organisation incur any costs in implementing CP1429?

### Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 4   | 5  | 0                  | 0     |

### Responses

| Respondent                   | Response | Rationale                                                                                                                                                                                                                                                          |
|------------------------------|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| British Gas                  | No       | -                                                                                                                                                                                                                                                                  |
| EDF Energy                   | Yes      | Only with respect to increase in ongoing operational costs to carry out additional proving tests.                                                                                                                                                                  |
| E.ON                         | No       | -                                                                                                                                                                                                                                                                  |
| IMServ                       | Yes      | The proving test processes is manual and time consuming, during normal circumstances the work is low volume and manageable, however during the implementation P272 the volume will be extremely high so additional resource will be required to complete the task. |
| ScottishPower                | No       | While the implementation of CP1429 itself will involve little or no cost, its impact will be to add significant 'proving' costs to the proposed transfer of customers from NHH to HH as a result of the implementation of P272.                                    |
| Siemens Operational Services | Yes      | Siemens costs will include recruitment, training and employment of temporary staff for six months to handle the CoMC for the P272 implementation. In addition there is the cost of Dialling software and dialling costs to Prove each of the CoP10 meters.         |
| SSE Energy Supply Limited    | No       | -                                                                                                                                                                                                                                                                  |
| TMA Data Management Ltd      | Yes      | The cost of CP1429 is mostly attributable to the proving tests for the P272 sites. Once P272 sites have completed the COMC, which includes a proving test, there will be very low ongoing costs that will be absorbed by normal operation.                         |
| Western Power Distribution   | No       | -                                                                                                                                                                                                                                                                  |

## Question 5: Do you agree with the proposed implementation approach for CP1429?

### Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 6   | 2  | 0                  | 1     |

### Responses

| Respondent  | Response | Rationale                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|-------------|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| British Gas | Yes      | -                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| EDF Energy  | Yes      | We agree that the implementation date should be in line with CP1411.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| E.ON        | Yes/No   | <p>We are concerned that 3rd party MOP agents may struggle to adhere to timescales to process flows in the 15 working day timescales.</p> <p>We believe an obligation should be placed on the DC to respond to a D0005 within 2 working days in order to provide the MOP with time to complete its processes.</p> <p>As proposed the DC could send the D0003 on day 14 leaving the MOP with no opportunity to respond within the 15 working days; however the DC would remain compliant. Mandating a turnaround time for the DC would mitigate this risk.</p>                                                                                                                                                                                                                                                                                                                                                                                                                    |
| IMServ      | No       | <p>We appreciate that CP1429 was raised with the objective of having measures place in time for P272, this in its-self is sensible, however we believe that it may prove to be counterproductive.</p> <p>Our concern is that during the implementation of P272 significant volumes of meters will be migrated from NHH to NHH on any given day (several hundred/thousand per day); this in itself is a mammoth undertaking which will tie-up much of the available resource, we believe that completing proving tests in-line with COP5 during the P272 will be extremely difficult to achieve. If the HHDC and Meter Operator are attempting to complete proving for a huge number of sites in-line with COP5 timescales we are concerned that agents will either fail to meet the targets or quality issues will creep-in.</p> <p>A P272 dispensation is recommended to prevent these risks and to allow MOPs and DCs to concentrate their attention on the more essential</p> |

| Respondent                   | Response | Rationale                                                                                                                                                                                                                                                                                                                                                                                                         |
|------------------------------|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                              |          | meter reconfiguration processes which carry a higher risk.                                                                                                                                                                                                                                                                                                                                                        |
| ScottishPower                | Yes      | It makes sense to align the implementation of CP1429 to the same date as CP1411.                                                                                                                                                                                                                                                                                                                                  |
| Siemens Operational Services | No       | Siemens disagree with the implementation approach with a date of 25th June 2015 due to the unknown transition profile of CoP10 meters for the P722 migration. It is possible that the transition timescales of the Suppliers may be less than the 5 months we have assumed and therefore the number of CoMC to be undertaken for these PC 5-8 meters will make it difficult to achieve the SLA for Proving Tests. |
| SSE Energy Supply Limited    | Yes      | -                                                                                                                                                                                                                                                                                                                                                                                                                 |
| TMA Data Management Ltd      | Yes      | CP1429 should have the same implementation date as CP1411 to be implemented in June 2015.                                                                                                                                                                                                                                                                                                                         |
| Western Power Distribution   | Yes      | -                                                                                                                                                                                                                                                                                                                                                                                                                 |

## Question 6: Do you have any further comments on CP1429?

### Summary

| Yes | No |
|-----|----|
| 2   | 7  |

### Responses

| Respondent                   | Response | Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|------------------------------|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| British Gas                  | No       | -                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| EDF Energy                   | No       | -                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| E.ON                         | No       | -                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| IMServ                       | Yes      | We would like to propose that the CoP10 HH proving timescales be relaxed during the P272 migration period, we believe that more manageable timescales during this difficult period would promote better behaviour and more accurate results, whereas the current proposal may pressure agents and result in errors.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| ScottishPower                | No       | -                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Siemens Operational Services |          | <p>Siemens have serious concerns about the practicalities of implementing P272. The volume of CoP10 meters that have to be Proved to meet the requirements of P272 is far in excess of normal CoMC volumes, even if the process can be spread over a five month period.</p> <p>Siemens request that ELEXON delays the implementation of CP1411, and therefore CP1429, until the transition period is complete.</p> <p>The reasoning behind this proposal is that if the CoP10 meters in PC 5-8 were migrated to HH Settlement before 25th June 2015 they would be exempt from Proving. We do not see that these meters will cause any greater risk to Settlement post 25th June than they will prior to this date; these meters are currently being used in the Industry and are being Settled on. We see no reason why there should be any difference between their performance and those CoP10 meters on elective HH Settlement which are un-Proven.</p> <p>Siemens believe the risk of non-compliance to CoMC is significantly increased with the number of meters undergoing the process increasing by an exponential factor. With the likelihood that the</p> |

| Respondent                 | Response | Comments                                                                                                                                                                                                                                                                                                                                                                                               |
|----------------------------|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                            |          | <p>transition will be condensed into a short timescale it is probable that temporary staff will be required to handle the volume, this raises the potential for errors to occur.</p> <p>Removing the requirement to Prove Cop10 meters transitioning to HH Settlement post 25th June 2015 will make a significant contribution in keeping the transition period to within the proposed timescales.</p> |
| SSE Energy Supply Limited  | No       | -                                                                                                                                                                                                                                                                                                                                                                                                      |
| TMA Data Management Ltd    | No       | -                                                                                                                                                                                                                                                                                                                                                                                                      |
| Western Power Distribution | No       | -                                                                                                                                                                                                                                                                                                                                                                                                      |

**BSCP514**

| Respondent              | Location | Comment                                                                                                                                                                  |
|-------------------------|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| EDF Energy              | BSCP502  | We believe section 4.6.5 of BSCP502 should also be updated to reflect changes to the timescales.                                                                         |
| IMServ                  | BSCP502  | We agree that the reline changes deliver the desired result. Please note however that similar changes are also required to BSCP502.                                      |
| TMA Data Management Ltd | BSCP502  | No redlining proposed for BSCP502, if accepted as it is, CP1429 would create a mismatch between requirements listed for proving tests timescales in BSCP514 and BSCP502. |