

CP Consultation Responses

CP1439 'Proving Test Permissible Software'



This CP Consultation was issued on 5 May 2015 as part of CPC00756, with responses invited by 29 May 2015.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
British Gas	1/0	Supplier
E.ON Energy Solutions Limited	1/0	Supplier
EDF Energy	10/1	Generator, Supplier, Non Physical Trader, ECVNA, MVRNA, Supplier Agent, Consolidator
G4S Utility and Outsourcing Services (UK) Limited	0/1	Supplier Agent
IMServ	0/1	Supplier Agent
Npower Ltd	9/0	Generator, Supplier, 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	4/1	Distributor, Supplier Agent

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
British Gas	✓	✗	✗	✓
E.ON Energy Solutions Limited	✓	-	✗	✓
EDF Energy	✓	✗	✗	✓
G4S Utility and Outsourcing Services (UK) Limited	✓	✗	✗	✓
IMServ	✗	✓	✓	✗
Npower Ltd	✗	✓	✗	✗
ScottishPower	✓	✗	✗	✓
Siemens Operational Services	✓	✗	✗	✓
SSE Energy Supply Limited	✓	✗	✗	✓
TMA Data Management Ltd	✓	✗	✗	✓
Western Power Distribution	✗	✓	✓	✓

Question 1: Do you agree with the CP1439 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
8	3	0	0

Responses

Respondent	Response	Rationale
British Gas	Yes	-
E.ON Energy Solutions Limited	Yes	Yes, although we seek clarification as to the intent and objectives as we are unsure the change delivers its intended purpose.
EDF Energy	Yes	Yes, we believe this change is sensible.
G4S Utility and Outsourcing Services (UK) Limited	Yes	The proposed change will maintain the accuracy of the proving test while allowing more flexibility in the software to be used.
IMServ	No	<p>Whilst we agree with the rationale for the proposal, we do not agree with the solution proposed.</p> <p>A principal objective of the proving test is to ensure that the metering details that have been provided to the DC in the MTDs match up with those in the meter and that they have been applied correctly by the DC to enable retrieval of correct consumption values.</p> <p>In order to achieve this objective the MOP therefore needs to use software in their test which is not reliant on the information contained within the MTDs as, these may contain an error. The MOP needs to obtain the actual values recorded by the meter, unaffected by any potential errors introduced in either documenting the meter set up in the MTDs or errors introduced in the application of these in any software.</p> <p>More significantly, this proposal would result in many instances in the MOP and DC using either the same single business instance of software to perform their individual responsibilities in the proving test process or the same version of software: this removes the required independence. In such a scenario both parties would retrieve the same value therefore indicating a successful proving test whilst that value may actually be incorrect. Furthermore, in these circumstances there is no</p>

Respondent	Response	Rationale
		value in the DC participating in the process. We have considered whether there is a means of ensuring both parties use different software however this could only be achieved via some central co-ordination point/register which is counterproductive to the objective of the proposal.
Npower Ltd	No	<p>We agree that there is an issue around the volume of proving tests which will be required for P272, however we do not agree with the proposed solution.</p> <p>HHDCs will, for some meter types rely on the information provided in the D0268 to determine what pulse multiplier to apply to the data it retrieves from the meter. Meter Manufacturer software deals with the pulse multiplier automatically and so a proving test is designed to ensure that the data passed on a D0268 to HHDC is correctly allowing the HHDC to interpret the data it retrieves by comparing the HHDC view with that of the MOA (and manufacturer's software).</p> <p>If an MOA was to use software approved under BSCP601 for use by the HHDC then all it would be doing would be duplicating what the HHDC has already done and effectively proving nothing. If the pulse multiplier used in the MOA and HHDC versions of the BSCP601 approved software matched (even if it was actually wrong) the data would match and the proving test would pass, which would make the test worthless.</p> <p>Also the Compliance and Protocol Approvals list is agent specific and no MOA will have undergone approval testing as this is a HHDC requirement.</p> <p>Any software used by the MOA to retrieve data to fulfil it's part of the proving test should be transparent in terms of its use of multipliers, i.e., a user should not need to tell the software what multiplier to use.</p> <p>This change would in some cases make a proving test meaningless as the information would always matchup between DC and MOP. If this were to be implemented there would be no material change to DC as it is the MOP who would be using different software.</p>
ScottishPower	Yes	-
Siemens	Yes	CP1439 will allow HHMOAs to be more efficient in

Respondent	Response	Rationale
Operational Services		performing Proving Tests in the run up to the implementation of P272. As the alternative software has to meet the same requirement as the meter manufactures software under BSCP601, the outcome of the Proving Test should be independent of with software is used.
SSE Energy Supply Limited	Yes	-
TMA Data Management Ltd	Yes	We fully support the use of BSCP601 compliant software for proving test data retrieval by MOA.
Western Power Distribution	No	Whilst we support the principle of extending the rights of the HHMOA to use software other than the manufacturers' we consider that restricting this extension to software with BSCP 601 Protocol Approval is unnecessary. Method 3 permits use of own software without mention of BSCP 601 Protocol Approval and in this regard we believe that Method 4 wording should be the same as current Method 3.

Question 2: Do you agree that the draft redlining delivers the CP1439 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
10	1	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	-
E.ON Energy Solutions Limited	Yes	Yes subject to clarification of points per answer to Q.3.
EDF Energy	Yes	-
G4S Utility and Outsourcing Services (UK) Limited	Yes	The redlining matches reflect the change proposal.
IMServ	Yes	However we do not agree with the proposed solution.
Npower Ltd	No	See response to question 1.
ScottishPower	Yes	-
Siemens Operational Services	Yes	-
SSE Energy Supply Limited	Yes	-
TMA Data Management Ltd	Yes	The draft redlining does deliver the CP1439 proposed solution.
Western Power Distribution	Yes	We agree it aligns with the proposed solution however we do not like the proposed solution as it is too limited.

Question 3: Will CP1439 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
3	7	1	0

Responses

Respondent	Response	Rationale
British Gas	No	-
E.ON Energy Solutions Limited	Yes/No	<p>We are concerned that the proposal seems to suggest that a proving test be carried out by identical software for both DC and MOP which would seem to result in it proving that the same software can communicate with the meter with the same result.</p> <p>We would like further clarity on how the change therefore removes inefficiency from the current process and would assist with proving tests required for P272.</p>
EDF Energy	No	-
G4S Utility and Outsourcing Services (UK) Limited	No	This CP will allow for changes in the proving process but will not require us to make any changes.
IMServ	Yes	In its current form it will increase the risk of incorrect proving occurring. To be clear, we do agree with the rationale for this CP, and it would allow us to perform our proving activities more efficiently however we would only support it if it can be implemented while maintaining the objectives and independence of the proving test process.
Npower Ltd	Yes	If this were to be implemented there would be no material change to DC as it is the MOP who would be using different software, but as described above the proving tests would no longer be beneficial and an alternative would be required.
ScottishPower	No	There will be no impact on current processes as ScottishPower only use meter manufacturer software to dial the meter on an individual basis and will continue to do so.
Siemens Operational	No	-

Respondent	Response	Rationale
Services		
SSE Energy Supply Limited	No	-
TMA Data Management Ltd	No	As HHDC, TMA is not directly impacted by CP1439.
Western Power Distribution	Yes	We are potentially impacted if we use Proving Method 4.

Question 4: Will your organisation incur any costs in implementing CP1439?

Summary

Yes	No	Neutral/No Comment	Other
2	9	0	0

Responses

Respondent	Response	Rationale
British Gas	No	-
E.ON Energy Solutions Limited	No	-
EDF Energy	No	-
G4S Utility and Outsourcing Services (UK) Limited	No	-
IMServ	Yes	This proposal would allow our MOP business to utilise the dialling software used by the HHDC business therefore processes would need to be reviewed and redesigned.
Npower Ltd	No	-
ScottishPower	No	-
Siemens Operational Services	No	-
SSE Energy Supply Limited	No	-
TMA Data Management Ltd	No	-
Western Power Distribution	Yes	Potentially but the extent of these is currently unknown.

Question 5: Do you agree with the proposed implementation approach for CP1439?

Summary

Yes	No	Neutral/No Comment	Other
9	2	0	0

Responses

Respondent	Response	Rationale
British Gas	Yes	-
E.ON Energy Solutions Limited	Yes	Yes subject to clarification of understating set out in Q.3.
EDF Energy	Yes	-
G4S Utility and Outsourcing Services (UK) Limited	Yes	Implementation needs to be in time for the bulk of the P272 CoMC to be of maximum benefit.
IMServ	No	This proposal has been made specifically to address concerns regarding high volumes during the P272 CoMC period (PC 5 – 8 metres only) but in its current format also allows this approach on any site which requires proving in the HH Market thus introducing ongoing risk to Settlement.
Npower Ltd	No	We believe another solution is required.
ScottishPower	Yes	-
Siemens Operational Services	Yes	CP1439 needs to be in place for when P300 is implemented (on 5th November 2015) when new HH Measurement Classes are introduced. It is following the implementation of P300 that it is assumed that majority of CoMC (including Proving Tests) will be undertaken prior to P272.
SSE Energy Supply Limited	Yes	-
TMA Data Management Ltd	Yes	An implementation date of 05/11/2015 for CP1439 is required to match the P300 implementation and the start of P272 COMC processes to get maximum benefits from CP1439.
Western Power Distribution	Yes	-

Question 6: Do you have any further comments on CP1439?

Summary

Yes	No
2	9

Responses

Respondent	Response	Comments
British Gas	No	-
E.ON Energy Solutions Limited	No	-
EDF Energy	No	-
G4S Utility and Outsourcing Services (UK) Limited	No	-
IMServ	Yes	<p>Whilst we support the concerns expressed by the raiser of this proposal, i.e. excessive volumes of proving tests to be undertaken to support P272/P322, there are other options which could be considered to address this issue including:</p> <p>1) Relaxation of the Proving Test timescales during the P272/P322 migration for PC 5 – 8 sites only. A timeframe could still be specified within the Settlement Window for these lower consumption value sites.</p> <p>2) Discretion to be applied by BSC auditor during subsequent audit</p> <p>These options have the advantage of being timebound and restricted to the P272 exercise whereas the proposal is enduring and therefore introduces risk ongoing to the Proving Test process.</p>
Npower Ltd	No	-
ScottishPower	No	-
Siemens Operational Services	No	-
SSE Energy Supply Limited	Yes	1) Though not directly impacted by this change, we are supportive of HHMOAs developing BSC compliant solutions that aid them in complying with the proving test requirements related to the P272

Respondent	Response	Comments
		implementation. 2) We seek assurance that any alternate software will return true values without any multipliers applied.
TMA Data Management Ltd	No	-
Western Power Distribution	No	-

CP redlined text

No comments were received on the draft redlined text for CP1439.