

CP Consultation Responses

CP1440 'Exempting Metering Systems in Measurement Class F from proving tests'



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
EDF Energy	10/1	Generator, Supplier, Non Physical Trader, ECVNA, MVRNA, Supplier Agent, Consolidator
IMServ	0/1	Supplier Agent
Npower Ltd	9/0	Generator, Supplier, Supplier Agent
ScottishPower	1/1	Supplier, 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	✓	✗	✗	✓
EDF Energy	✓	✗	✗	✓
IMServ	✗	✓	✓	✗
Npower Ltd	✓	✓	✓	✓
ScottishPower	✓	✗	✗	✓
SSE Energy Supply Limited	✓	✓	✗	✓
TMA Data Management Ltd	✓	✓	✓	✓
Western Power Distribution	✓	✓	✓	✓

Question 1: Do you agree with the CP1440 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
7	1	0	0

Responses

Respondent	Response	Rationale
British Gas	Yes	-
EDF Energy	Yes	Yes, we believe this change is sensible.
IMServ	No	Whilst we agree with the rationale for the proposal, in its current format it will remove the obligation for all non-domestic measurement class F sites as well as the intended domestic sites. The obligation should remain for non-domestic sites. Also in order to apply an exemption for domestic sites there needs to be some way for the Meter Operator to identify such. There is no means of doing such within the information which the MOP receives and therefore DTC flow changes would be required to support this proposal.
Npower Ltd	Yes	-
ScottishPower	Yes	-
SSE Energy Supply Limited	Yes	We are fully supportive of the proposed solution and believe it will provide further clarity regarding the manner in which we manage domestic HH metering arrangements.
TMA Data Management Ltd	Yes	We agree that CP1440 is necessary once CP1261 is implemented in June 2015. The effort that would be required to complete proving tests for sites in MC F would far outweigh any benefit and would provide a significant barrier to elective HH Settlement.
Western Power Distribution	Yes	We agree the proposed solution but meeting the proposed date for system changes will be difficult and February 2016 might be a more realistic release date for this change. It seems reasonable to remove the need to do unnecessary testing, however, notification of the MC is reliant on the Supplier forwarding a D0289 flow to the HHMOA on Change of MC from NHH to HH and although the BSCP 514 process requires this, these flows do not always arrive at the necessary time,

Respondent	Response	Rationale
		therefore we recommend Suppliers review their systems to ensure these flows are sent in accordance with the requirements in the BSCP.

Question 2: Do you agree that the draft redlining delivers the CP1440 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
7	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	-
EDF Energy	Yes	-
IMServ	No	See above in question 1.
Npower Ltd	Yes	-
ScottishPower	Yes	-
SSE Energy Supply Limited	Yes	-
TMA Data Management Ltd	Yes	The draft redlining texts deliver the CP1440 proposed solution.
Western Power Distribution	Yes	-

Question 3: Will CP1440 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
5	3	0	0

Responses

Respondent	Response	Rationale
British Gas	No	-
EDF Energy	No	-
IMServ	Yes	In its current format we could not implement the requirements however if DTC flow changes were agreed it would result in costs.
Npower Ltd	Yes	This will have system impacts on HHDC and HHMO.
ScottishPower	No	-
SSE Energy Supply Limited	Yes	It supports the overall project for implementation of P272.
TMA Data Management Ltd	Yes	It impacts TMA positively as it removes the requirement to carry out proving tests for MC F sites.
Western Power Distribution	Yes	We will need to make system and process changes to avoid triggering the proving test process on a Change of Measurement Class to HH Measurement Class F.

Question 4: Will your organisation incur any costs in implementing CP1440?

Summary

Yes	No	Neutral/No Comment	Other
4	4	0	0

Responses

Respondent	Response	Rationale
British Gas	No	-
EDF Energy	No	-
IMServ	Yes	Yes if the required changes which we indicated are made.
Npower Ltd	Yes	The system changes required will have an associated cost however we are unable to provide details at this time.
ScottishPower	No	-
SSE Energy Supply Limited	No	-
TMA Data Management Ltd	Yes	Minimal cost to ensure accurate reporting of proving tests requirements.
Western Power Distribution	Yes	Relatively low cost however, we have not yet obtained exact costs from our system service provider.

Question 5: Do you agree with the proposed implementation approach for CP1440?

Summary

Yes	No	Neutral/No Comment	Other
7	1	0	0

Responses

Respondent	Response	Rationale
British Gas	Yes	-
EDF Energy	Yes	-
IMServ	No	See above.
Npower Ltd	Yes	-
ScottishPower	Yes	-
SSE Energy Supply Limited	Yes	-
TMA Data Management Ltd	Yes	We agree that CP1440 would benefit from an implementation date matching P300 implementation and the start of P272 COMC processes.
Western Power Distribution	Yes	However, a February 2016 release date may be more appropriate.

Question 6: Do you have any further comments on CP1440?

Summary

Yes	No
1	7

Responses

Respondent	Response	Comments
British Gas	No	-
EDF Energy	No	-
IMServ	Yes	It would be useful to understand potential volumes in order to validate whether there is sufficient business case for this proposal.
Npower Ltd	No	-
ScottishPower	No	-
SSE Energy Supply Limited	No	-
TMA Data Management Ltd	No	-
Western Power Distribution	No	-

CP redlined text

No comments were received on the draft redlined text for CP1440.