

# CP Assessment Report

## CP1444 'Extend the timescale of CoP10 Proving Tests until the implementation of P272'

**ELEXON**



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### Committee

Supplier Volume Allocation Group

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### Recommendation

Approve

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### Implementation Date

5 November 2015  
(November 2015 Release)



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## About This Document

This document is the Change Proposal (CP) Assessment Report for CP1444 which ELEXON will present to the Supplier Volume Allocation Group (SVG) at its meeting on 29 September 2015. The SVG will consider the proposed solution and the responses received to the CP Consultation before making a decision on whether to approve CP1444.

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 initial views on the proposed changes and the views of respondents to the CP Consultation.
- Attachments A and B contain the proposed redlined changes to deliver the CP1444 solution.
- Attachment C contains the full responses received to the CP Consultation.

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# 1 Why Change?



## What is a proving test?

A proving test is undertaken by a Half Hourly Data Collector (HHDC) and a Half Hourly Meter Operator Agent (HHMOA) whenever a Half Hourly (HH) Metering System has been installed or reconfigured. One such instance is when a Metering System changes from a Non Half Hourly (NHH) Measurement Class to a HH Measurement Class.

These tests are carried out to give assurance to the Supplier and the HHDC that information being received from the Metering System by the HHDC and the details received in the D0268 'Half Hourly Meter Technical Details' data flow are all correct. This assurance is necessary as the data is used both to bill the relevant customer and in Settlement.

A proving test involves the HHMOA asking the HHDC to obtain a HH Meter reading from the Metering System for a given Settlement Period. The HHMOA will then compare this to the reading it obtained when it installed or reconfigured the Metering System. A proving test is usually a manual process for both the HHMOA and the HHDC.

## History of the CoP10 proving test exemption

### Why were CoP10 Metering Systems exempt from proving tests?

[Code of Practice \(CoP\) 10 'Metering of Energy via Low Voltage Circuits for Settlement Purposes'](#) was introduced in February 2009 by [CP1261 'Introducing Metering Code of Practice 10 to facilitate smart metering in the HH market'](#). By introducing a lower specification CoP, this CP sought to make it easier for Suppliers to move from NHH to HH Settlement without incurring significant costs. As part of this, CP1261 removed the need for proving tests for whole current (WC) Metering Systems, which would not have had to undergo a proving test had they remained NHH.

CoP10 was originally intended to cover WC Meters for use in the HH elective (below 100kW) market. CP1261 envisaged that proving tests would still be required for current transformer (CT) operated Metering Equipment under [CoP5 'The Metering of Energy Transfers with Max Demand of up to \(and including\) 1MW for Settlement Purposes'](#). [CP1273 'Changes to the scope of CoP10 to cover current transformer operated Meters'](#) subsequently extended CoP10 to include CT operated Metering Equipment in June 2009. However, CP1273 did not change the exemption from proving tests for CoP10 Metering Systems.

### Why was this exemption removed?

The exemption from proving tests for CoP10 Metering Systems was removed in June 2015 by [CP1411 'Remove exemption from Proving Tests for Code of Practice 10 Metering Systems'](#). This CP was progressed because of [P272 'Mandatory Half Hourly Settlement for Profile Classes 5-8'](#), as the CP1411 Proposer felt that the original case for removing barriers to elective HH had changed. They noted that a significant number of the CoP10 Meters installed for the mandatory Automatic Meter Reading (AMR) Meter rollout will need to be settled HH under P272, and that these will therefore need to be migrated to HH Settlement by P272's Implementation Date of 1 April 2017. As a result, the CP1411 Proposer felt that proving tests should be applied to all HH Metering Systems, whether or not they were mandated to be settled HH.

## What is a Measurement Class?

The Measurement Class of a Metering System reflects how it is settled, e.g. whether it is settled HH or NHH or whether it is metered or unmetered.

There are currently five Measurement classes:

- A: NHH Metered
- B: NHH Unmetered
- C: HH Metered that are 100kW Metering Systems
- D: HH Unmetered
- E: HH Metered that are not 100kW Metering Systems

From 5 November 2015, existing Measurement Class E will be split into three:

- E: HH CT Metering Systems that have site specific DUoS billing and are not 100kW Metering Systems
- F: domestic HH CT and WC Metering Systems that have aggregated DUoS billing and are not 100kW Metering Systems
- G: non-domestic HH WC metered Metering Systems that have aggregated DUoS billing and are not 100kW Metering Systems

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[CP1429 'Proving Test timescales'](#) was also implemented in June 2015 and put in place timescales for proving tests for a CoP10 Metering System. These timescales allow 15 Working Days (WD) in which to complete the proving test, with a subsequent 15WD period given if a re-test is required.

## How will this impact the migration to HH Settlement under P272?

P272 requires that all Metering Systems currently registered in Profile Classes (PCs) 5-8 which have an AMR Meter installed are settled HH no later than 1 April 2017. There are currently a total of around 168,000 Metering Systems in PCs 5-8, and these will all need to be migrated to HH Settlement before P272's Implementation Date. These will all be subject to a proving test as part of this migration.

The implementation of [P300 'Introduction of new Measurement Classes to support Half Hourly DCUSA Tariff Changes \(DCP179\)'](#) on 5 November 2015 will introduce two new Measurement Classes for HH settled Metering Systems that are below the 100kW threshold. It is likely that the full-scale migration of Metering Systems impacted by P272 will not begin before this date, as Suppliers will want to migrate their Metering Systems to the correct Measurement Class. The implementation of [P322 'Revised Implementation Arrangements for Mandatory Half Hourly Settlement for Profile Classes 5-8'](#) on 3 August 2015 has also made 5 November 2015 the mandatory start date for the migration. This will therefore give a window of around 17 months in which to complete the full migration before 1 April 2017.

## What is the issue?

There are a significant number of Metering Systems due to be migrated for P272, of which a large majority will become CoP10 Metering Systems. As part of this migration, the Metering Systems will need to move from a NHH Measurement Class to a HH Measurement Class, and therefore will need to undergo a proving test.

The Proposer believes that the current Change of Measurement Class (CoMC) process is not designed to handle such a large volume in such a short space of time. They are concerned that the proving test timescales for CoP10 Metering Systems are too short. They note that the normal annual volume of CoMCs is of the order of hundreds per HHMOA, while the volume during the P272 migration will be several times larger. This will require a corresponding increase in resource needed by HHMOAs. They also highlight [Ofgem's letter to the BSC Panel in April 2015](#) where Ofgem notes that the CoMC process and the associated volume of CoMCs required under P272 could pose a potential risk to Settlement.

The Proposer considers that the reason for carrying out a proving test is to give Suppliers and HHDCs confidence that the data being retrieved from the Meter is correct, both for billing and Settlement. However, they feel that a proving test provides only minor additional assurance for CoP10 Metering Systems transferring to HH Settlement. This is because the Meter must be providing regular remote NHH monthly readings before HH conversion, and the probability of an error for WC Meters is considered low. The Proposer is concerned that, during periods when a high volume of Metering Systems are being migrated:

- proving tests may be rushed by Supplier Agents in order to meet timescales; or

- the timescales approved under CP1429 may be missed, resulting in the HHMOA being deemed non-compliant.

## How else is this risk being mitigated?

The Proposer has noted other changes that may mitigate this issue, but does not consider them to be enough to fully resolve the risks:

- P322 has introduced a longer timescale and a more structured approach for the P272 migration. However, the Proposer considers that, because contract renewals are seasonal, there will still be peak months of migration volumes which HHMOAs will find difficult to manage and resource.
- [CP1439 'Proving Test Permissible Software'](#) will allow HHMOAs to use approved alternative software to Meter manufacturers' software when retrieving Meter configuration details for proving tests. This will allow proving tests for a batch of Meters to be carried out in parallel. However, the Proposer considers that, while some alternative software can do this, not all the approved alternative software used by Supplier Agents has this functionality.
- [CP1440 'Exempting Metering Systems in Measurement Class F from proving tests'](#) has exempted Metering Systems migrating to new Measurement Class F from proving tests, and will be implemented alongside P300. This will reduce the number of CoP10 Metering Systems requiring proving tests. However, the Proposer believes that these will constitute only around 5% of the Metering Systems affected by P272 and thus will have little impact on the overall volume of proving tests required.

### Proposed solution

[CP1444 'Extend the timescale of CoP10 Proving Tests until the implementation of P272'](#)

was raised by Haven Power. It proposes to extend the proving test timescales for CoP10 Metering Systems:

- from 15WD to 30WD to complete the proving test; and
- from 15WD to 30WD to complete a re-test should the first test fail.

The extended timescale will apply only to a proving test for a CoP10 Metering System that is started during the period:

- on or after 5 November 2015 (the P300 Implementation Date and P322 mandatory migration start date); and
- up to but not including the P272 Implementation Date (1 April 2017).

Proving tests for CoP10 Metering Systems started outside this window will remain subject to the 15WD timescales approved under CP1429. CP1444 will not affect the proving test timescales for Metering Systems that are assigned to any other CoP.

### Proposer's rationale

The Proposer believes that increasing the proving tests timescale for CoP10 Metering Systems during the P272 migration will allow HHMOAs to smooth out the peaks and troughs in migration volumes. This will help them more effectively manage their part of the process. They can also put sufficient resource in place by retaining a dedicated group of staff for the migration period, rather than needing a temporary workforce to cover the peak periods. The Proposer also considers that the proposed increase in timescales will help reduce the likelihood of data quality issues. They consider that these could potentially be a risk to Settlement if this volume of proving tests had to be carried out to the timescales as approved under CP1429. The Proposer has spoken with a HHMOA to validate these concerns before raising this CP.

The Proposer believes that the extended timescales provide a balance between mitigating the following risks:

- any risk to Settlement from extending proving test timescales, which could mean it takes longer to identify a Metering System that has failed a test;
- any risk of errors occurring when attempting to comply with the current 15WD timescale during periods of high proving test volumes; and
- any risk of the HHMOA being non-compliant with the timescales for completing proving tests.

### Proposed redlining

Attachments A and B contain the proposed changes to [BSC Procedure \(BSCP\) 502 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'](#) and [BSCP514 'SVA Meter Operations for Metering Systems Registered in SMRS'](#) to deliver CP1444.

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## 3 Impacts and Costs

### Central impacts and costs

CP1444 will require changes to BSCP502 and BSCP514. No system changes are required, and there will be no impact on BSC Agents.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none"><li>• BSCP502</li><li>• BSCP514</li></ul>	<i>None</i>

The central implementation costs for CP1444 will be approximately £240 (one ELEXON man day) to implement the relevant document changes.

### BSC Party & Party Agent impacts and costs

Respondents to the CP Consultation noted minor process changes will be needed to implement this CP, to account for the longer timescales. Supplier Agent respondents also highlighted the positive impact CP1444 will have for them. These included allowing them more time to complete proving tests during the P272 migration period or reducing the amount of extra staff they would require to complete these.

Only one respondent identified costs associated with implementing CP1444, and noted that these are expected to be minor costs.

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

## 4 Implementation Approach

### Recommended Implementation Date

CP1444 is proposed for implementation on **5 November 2015** as part of the November 2015 BSC Systems Release.

The Proposer is requesting this date as it aligns with P300's introduction of the new Measurement Classes. They expect that the number of Metering Systems migrating to HH Settlement will notably increase after this time. Extending CoP10 proving test timescales from this date will allow HHMOAs to better handle proving test volumes during the implementation of P272. We do not see an issue with implementing CP1444 on this date, should it be approved, and so agree with this proposed implementation approach.

All 11 respondents to the CP Consultation agreed with the proposed implementation approach.

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### SVG's initial views

The SVG considered CP1444 at its meeting on 4 August 2015 ([SVG174/09](#)).

### ELEXON's initial concerns

We noted that the Proposer has highlighted the trade-off between mitigating the risk of a HHMOA or HHDC failing to meet proving test timescales and any Settlement risk arising from taking longer to identify Metering Systems that fail a proving test. They believe their proposed 30WD timescales provide the most suitable balance between the two.

We were initially concerned that, by extending the timescales, there would be a risk of unduly delaying proving tests which could otherwise be completed in 15WD. This could result in a longer period over which Settlement errors could build, and which would need correcting if the Metering System failed the proving test. We considered this risk to Settlement to outweigh the consequences of a HHMOA failing to meet the proving test timescales. We therefore considered that the timescales should not be extended but that views on this balance of risk should be sought from CP Consultation respondents.

As part of this, we believed it would also be beneficial to ask HHMOAs whether the extended timescales proposed by CP1444 will be long enough for them to be able to resolve all failed proving tests, or whether there would still be a risk that they could fail to meet these. We would not have considered it appropriate to extend the timescales if HHMOAs would still be unable to meet them.

We also noted that a large part of the issue can arise from carrying out a proving test when there is no load to prove against. We were unclear how additional time would resolve this.

### SVG's initial discussions

SVG Members believed that CP1444 seemed a practical and sensible solution. One Member noted that Supplier Agents would likely see a significant increase in the number of proving tests required around the contract rounds in April and October. Another Member queried whether the proposed six week timescale would be long enough, but the SVG overall believed that 30WD was the right timescale to put forward, and did not believe that there was a case for anything longer.

The SVG noted our views around the potential risk to Settlement, but Members did not agree that CP1444 would increase the risk to Settlement. One Member believed that, as long as data was corrected by the Second Reconciliation Run (R2) then this should not be an issue for Settlement. R2 takes place around five months after the relevant Settlement Date, and the timescales proposed by CP1444 would still meet this. The SVG thought that any impact would more likely relate to cash flows, for example if incorrect Meter readings caused imbalance charges for Suppliers.



## 6 Industry Views

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

Summary of CP1444 CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1444 proposed solution?	11	0	0	0
Do you agree that the draft redlining delivers the intent of CP1444?	11	0	0	0
Will CP1444 impact your organisation?	8	3	0	0
Will your organisation incur any costs in implementing CP1444?	1	10	0	0
Do you agree with the proposed implementation approach for CP1444?	11	0	0	0
Do you consider that the potential risk to Settlement from extending the timescales for CoP10 proving tests would outweigh the consequences of a HHMOA failing to meet timescales?	1	10	0	0
Do you consider that the proposed 30WD timescales is long enough to resolve each failed proving test during the P272 migration period?	9	0	1	1
Do you have any further comments on CP1444?	1	10	0	0

### Comments on CP1444

All 11 respondents to the CP Consultation supported CP1444.

Supplier Agents noted the large numbers of CoMCs they expect to receive during the P272 migration period. They believed that extending the timescales as proposed by CP1444 will be beneficial. One Supplier Agent noted that this will allow them to smooth out the number of proving tests during peak periods. This means they could continue to use experienced resources rather than rely on temporary inexperienced resource during these spikes. Another Supplier Agent supported the view that the longer timescales will reduce the risks associated with the expected volume of CoMCs.

Other respondents, including several Suppliers, also supported CP1444. They noted that the longer timescales will allow HHMOAs more time to be able to manage the large volumes of proving tests expected during the P272 migration period. One Supplier believed that the longer timescales will not add much benefit, but felt that if Supplier Agents considered the extra time necessary then they would support the change.

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## Comments on the risk to Settlement

Following the concerns we outlined in Section 5, we asked respondents for their views. Ten of the 11 respondents disagreed with our concerns.

Several respondents noted that any data quality issues not picked up in time for the Initial Settlement Run (SF) would instead be picked up by the First Reconciliation Run (R1), which is still in the early part of the Settlement window. It was also considered that longer timescales will help spot any data quality issues in the first place, as Supplier Agents will not be rushing to complete large numbers of tests in short time periods. Respondents considered that not completing proving tests accurately would pose a greater risk to Settlement integrity than a delay to identifying and correcting any errors. It was also noted that the energy consumed by CoP10 Metering Systems would be very small due to their consumption being below the 100kW threshold.

Respondents were also in agreement that the 30WD timescales proposed by CP1444 will be long enough, believing this to be the right balance between any risk to Settlement and the risk of HHMOAs missing timescales. One Supplier agreed with the timescales proposed, but noted they would not support anything longer than this.

## ELEXON's subsequent views

Following these responses to our questions, we are satisfied that the risk to Settlement posed by CP1444 is expected to be small, and that we will not see a greater risk of Supplier Agents missing timescales. We therefore agree with respondents that CP1444 should be approved.

## Comments on the proposed redlining

We received no comments on the proposed redlining for CP1444.

## 7 Recommendations

We invite you to:

- **APPROVE** the proposed changes to BSCP502 and BSCP514 for CP1444; and
- **APPROVE** CP1444 for implementation on 5 November 2015 as part of the November 2015 Release.

## Appendix 1: Glossary & References

### Acronyms

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

Acronyms	
Acronym	Definition
AMR	Automatic Meter Reading
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
CT	current transformer
HH	Half Hourly
HHDC	Half Hourly Data Collector ( <i>Party Agent</i> )
HHMOA	Half Hourly Meter Operator Agent ( <i>Party Agent</i> )
NHH	Non Half Hourly
PC	Profile Class
R1	First Reconciliation Run ( <i>Settlement Run</i> )
R2	Second Reconciliation Run ( <i>Settlement Run</i> )
SF	Initial Settlement Run ( <i>Settlement Run</i> )
SVG	Supplier Volume Allocation Group ( <i>Panel Committee</i> )
WC	whole current
WD	Working Days

### 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
D0268	Half Hourly Meter Technical Details

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## 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	Codes of Practice page on the ELEXON website	<a href="https://www.elexon.co.uk/bsc-related-documents/related-documents/codes-of-practice/">https://www.elexon.co.uk/bsc-related-documents/related-documents/codes-of-practice/</a>
2	CP1261 page on the ELEXON website	<a href="https://www.elexon.co.uk/change-proposal/cp1261-introducing-metering-code-of-practice-10-to-facilitate-smart-metering-in-the-half-hourly-hh-market/">https://www.elexon.co.uk/change-proposal/cp1261-introducing-metering-code-of-practice-10-to-facilitate-smart-metering-in-the-half-hourly-hh-market/</a>
2	CP1273 page on the ELEXON website	<a href="https://www.elexon.co.uk/change-proposal/cp1273-changes-to-the-scope-of-cop10-to-cover-current-transformer-operated-meters/">https://www.elexon.co.uk/change-proposal/cp1273-changes-to-the-scope-of-cop10-to-cover-current-transformer-operated-meters/</a>
2	CP1411 page on the ELEXON website	<a href="https://www.elexon.co.uk/change-proposal/cp1411/">https://www.elexon.co.uk/change-proposal/cp1411/</a>
2	P272 page on the ELEXON website	<a href="https://www.elexon.co.uk/mod-proposal/p272-mandatory-half-hourly-settlement-for-profile-classes-5-8/">https://www.elexon.co.uk/mod-proposal/p272-mandatory-half-hourly-settlement-for-profile-classes-5-8/</a>
3	CP1429 page on the ELEXON website	<a href="https://www.elexon.co.uk/change-proposal/cp1429/">https://www.elexon.co.uk/change-proposal/cp1429/</a>
3	P300 page on the ELEXON website	<a href="https://www.elexon.co.uk/mod-proposal/p300/">https://www.elexon.co.uk/mod-proposal/p300/</a>
3	Ofgem's Response to the BSC Panel's Request to Extend the P272 Implementation Date on the Ofgem website	<a href="https://www.ofgem.gov.uk/publications-and-updates/ofgem-response-request-extension-implementation-date-balancing-and-settlement-code-modification-p272">https://www.ofgem.gov.uk/publications-and-updates/ofgem-response-request-extension-implementation-date-balancing-and-settlement-code-modification-p272</a>
3	P322 page on the ELEXON website	<a href="https://www.elexon.co.uk/mod-proposal/p322/">https://www.elexon.co.uk/mod-proposal/p322/</a>
4	CP1439 page on the ELEXON website	<a href="https://www.elexon.co.uk/change-proposal/cp1439/">https://www.elexon.co.uk/change-proposal/cp1439/</a>
4	CP1440 page on the ELEXON website	<a href="https://www.elexon.co.uk/change-proposal/cp1440/">https://www.elexon.co.uk/change-proposal/cp1440/</a>
5	CP1444 page on the ELEXON website	<a href="https://www.elexon.co.uk/change-proposal/cp1444/">https://www.elexon.co.uk/change-proposal/cp1444/</a>
5	BSCPs page on the ELEXON website	<a href="https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/">https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/</a>
7	SVG174 page on the ELEXON website	<a href="https://www.elexon.co.uk/meeting/svg-174/">https://www.elexon.co.uk/meeting/svg-174/</a>

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