

# CP Consultation Responses



## CP1448 'Changes to allowable software for Method 3 Proving Tests'

This CP Consultation was issued on 5 October 2015 as part of CPC00760, with responses invited by 30 October 2015.

### Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
British Gas	1/0	Supplier
EDF Energy	9/0	Generator, Supplier, Non Physical Trader, ECVNA, Supplier Agent, Consolidator
E.ON Energy Solutions Limited	1/0	Supplier
IMServ	0/1	Supplier Agent
RWE npower plc	9/0	Generator, Supplier, Supplier Agent
ScottishPower	2/1	Supplier
SSE Energy Supply Limited	1/0	Supplier, Supplier Agent
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	✓	✗	✗	✓
E.ON Energy Solutions Limited	✓	✗	✗	✓
IMServ	✗	✓	✗	✗
RWE npower plc	✗	✓	✗	✓
ScottishPower	✓	✗	✗	✓
SSE Energy Supply Limited	✗	✓	✓	✗
TMA Data Management Ltd	✓	✓	✗	✓
Western Power Distribution	✗	✓	✓	-

## Question 1: Do you agree with the CP1448 proposed solution?

### Summary

Yes	No	Neutral/No Comment	Other
5	4	0	0

### Responses

Respondent	Response	Rationale
British Gas	Yes	-
EDF Energy	Yes	Yes, as we believe the software used under the two Methods should have similar approval requirements.
E.ON Energy Solutions Limited	Yes	-
IMServ	No	<p>IMServ objected to CP1439, our views have not changed and we also object to CP1448.</p> <p>It should be noted prior to reading our response that CP1448 would, a) make the proving test process easier and quicker for our business and b) does not entail investment or cost. We still however disagree with the proposal.</p> <p>Before implementing a solution we believe there needs to be a problem.</p> <p>CP1439 made it possible for HH Meter Operators to use protocol approved software (used by HHDCs) to collect reads in volume to facilitate the implementation of P272. CP1448 extends this option and enforces it's use in those tests where meter manufacturers' software is not used (Method 3). The justification given for enforcing the use of BSCP601 protocols is the threat of data corruption and a perceived risk to settlements.</p> <p>We do not believe that non-BSCP601 protocols are a risk to the settlement data in a meter: proving test Method 3 has been in place and unchanged for many years and we are not aware of any examples of data corruption due to the use of non BSCP601 protocols. All read downloads for proving tests are done using 'read only' passwords therefore we do not understand how the risk of data corruption could occur. Does ELEXON have evidence of cases where this has happened, can this information be shared?</p> <p>It is logical that the MOP should use either</p>

Respondent	Response	Rationale
		<p>manufacturers' software or independent software to undertake their part in the proving test: the MOP should not use anything which the corresponding HHDC may also use, in order to ensure a true and independent test. By totally barring the MOP's use of independent software and replacing this with the use of DC protocol approved software, issues are less likely to be identified.</p> <p>CP1448 is effectively forcing MOPs to use protocol approved software for the P272 volumes as, this is the only 'bulk' solution available (as meter manufacturers' software cannot be used for high volume tests). This type of proving test will be a meaningless exercise in a high number of instances as detailed in our response to CP1439.</p>
RWE npower plc	No	<p>We believe that any software used by an MOA to retrieve data for a proving test should not require the input of items such as a pulse multiplier to get the correct result. Use of BSCP 601 approved software runs the risk of both the HHDC and MOA applying the same incorrect multiplier and getting the same incorrect result. It also isn't clear how approved software for an MOA will be tracked as MOAs do not currently approve software under BSCP 601.</p>
ScottishPower	Yes	<p>Yes, agree with the proposed solution to ensure approved software is being used for Method 3 Metering System Proving Tests.</p>
SSE Energy Supply Limited	No	<p>We agree that the software requirements for Method 3 should be subject to further consideration so they genuinely support the integrity of settlement arrangements; however we believe this proposal is not the right solution.</p> <p>We supported the forerunner CP1439 because it facilitates industry in efficiently managing the high number of Proving Tests required for P272. It was not a perfect solution but we concluded that the risks introduced by some HHMOAs and HHDCs using the same business instance of software were acceptable within the context of Method 4 and P272 delivery. CP1448 is not justified to support to P272 delivery and Method 3 and 4 have more differences than the requirements for the software being used.</p> <p>The existing arrangements for Method 3 allow HHMOA and HHDC to use either the same software or different software. There is an existing settlement risk where parties fulfilling both functions</p>

Respondent	Response	Rationale
		<p>use the same software and this lack of independence calls into question the efficacy of the Proving Test. The proposal may exacerbate this risk by increasing the likelihood of agents currently using different software to adopt the same software because it reduces the optionality of arrangements currently permitted under Method 3.</p> <p>CP1448 was discussed at the most recent meeting of the 'BSC Audit Market Issues – Proving Tests' (24/09). Many of the same or similar concerns we have raised regarding this proposal were discussed at that group. Given they are currently considering improvements to the Proving Test regime and recommending CPs to be raised, we would suggest this CP is considered by this group before a decision to accept/ reject is made.</p>
TMA Data Management Ltd	Yes	-
Western Power Distribution	No	<ol style="list-style-type: none"> <li>1. The change encourages DC and MOA agents to use the same systems to undertake proving tests and this reduces the limited assurance the proving process delivers.</li> <li>2. Is there any evidence that MOAs systems used for proving tests have posed a significant risk to Settlements? There is no requirement for third parties to use BSCP601 approved systems for non-Settlement purposes (eg customer reading their own meters) or for MOA agents to use BSCP601 approved software to contact the meters for other processes such as monitoring comms faults, test dialling on installation, responding to data queries and checking un-commissioned sites for prevailing load.</li> <li>3. The proposed test will not remove anomalies between Method 3 and 4.</li> <li>4. From 05/11/15 Method 4 will read: '...The MOA then uses either the manufacturer's software or software which has a relevant protocol approval in accordance with BSCP601...'</li> </ol> <p>Proposed text for Method 3: '...MOA then uses its own data retrieval system, which has a current protocol approval via BSCP601...'</p> <ol style="list-style-type: none"> <li>5. BSCP601 process does not envisage or support Protocol Approval from MOA.</li> </ol>

## Question 2: Do you agree that the draft redlining delivers the CP1448 proposed solution?

### Summary

Yes	No	Neutral/No Comment	Other
8	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	For consistency shouldn't Method 3 also allow "manufacturer's software" to align it with Method 4? If this is agreed then the BSCP514 wording will also need to be changed to reflect this
EDF Energy	Yes	-
E.ON Energy Solutions Limited	Yes	-
IMServ	Yes	-
RWE npower plc	Yes	-
ScottishPower	Yes	Yes, agree that the draft redlining covers the changes proposed.
SSE Energy Supply Limited	Yes	-
TMA Data Management Ltd	Yes	-
Western Power Distribution	No	Please see comments regarding continued inconsistency above in question 1.

## Question 3: Will CP1448 impact your organisation?

### Summary

Yes	No	Neutral/No Comment	Other
4	5	0	0

### Responses

Respondent	Response	Rationale
British Gas	No	-
EDF Energy	No	-
E.ON Energy Solutions Limited	No	-
IMServ	Yes	We are in a position where we could without difficulty use BSCP601 protocols for proving, however we feel this is inappropriate and devalues the test.
RWE npower plc	Yes	Use of BSCP 601 approved software runs the risk of both the HHDC and MOA applying the same incorrect multiplier and getting the same incorrect result.
ScottishPower	No	-
SSE Energy Supply Limited	Yes	Our HHMOA may need to seek approval to use existing software or use an alternative Method. The broader issue is that as a Supplier we would lose confidence in the Proving Test process for the reasons given in our response to Question 1.
TMA Data Management Ltd	No	-
Western Power Distribution	Yes	We currently use a system which is not BSCP601 approved but which has not caused any risk to Settlements. Further, this system continues to be developed to support better requirements for P272, managing D0001s, and monitoring metering systems ahead of commissioning (for which functions protocol approval is not required) and the need to continually update BSCP601 approval will frustrate such business improvements.

## Question 4: Will your organisation incur any costs in implementing CP1448?

### Summary

Yes	No	Neutral/No Comment	Other
2	7	0	0

### Responses

Respondent	Response	Rationale
British Gas	No	-
EDF Energy	No	-
E.ON Energy Solutions Limited	No	-
IMServ	No	None
RWE npower plc	No	-
ScottishPower	No	-
SSE Energy Supply Limited	Yes	We have been unable to assess the cost implications; any HHMOA costs should be one-off to expedite the compliance process for BSCP0601 for CP1448. If industry believe there is a limited settlements benefit of Method 3 for the reasons described in Q1 and some responses to CP1439, then the ongoing cost inefficiencies of industry completing Method 3 Proving Tests are worth considering.
TMA Data Management Ltd	No	-
Western Power Distribution	Yes	Ongoing cost of keeping protocol approval updated across all supported Meter types.

## Question 5: Do you agree with the proposed implementation approach for CP1448?

### Summary

Yes	No	Neutral/No Comment	Other
6	1	1	0

### Responses

Respondent	Response	Rationale
British Gas	Yes	-
EDF Energy	Yes	-
E.ON Energy Solutions Limited	Yes	-
IMServ	No	-
RWE npower plc	Yes	-
ScottishPower	Yes	-
SSE Energy Supply Limited	No	We do not support this solution but do believe that further consideration should be given the problem it is seeking to address. February 2016 has been proposed solely on the basis that it is the next available release; we suggest this date is deferred pending discussion at the 'BSC Audit Market Issues – Proving Tests' group.
TMA Data Management Ltd	Yes	-
Western Power Distribution	Yes/No	-

## Question 6: Do you have any further comments on CP1448?

### Summary

Yes	No
2	7

### Responses

Respondent	Response	Comments
British Gas	No	-
EDF Energy	No	-
E.ON Energy Solutions Limited	Yes	In review of this CP, we raised a question with ELEXON as to how suppliers can check that the software that they or their agents maybe using has been approved under BSCP601. We understand that a revised list will be issued and made available for parties to check post this change. There is a potential risk here that parties may be using unapproved software without currently having a means to check. The consequences of which are unclear.
IMServ	Yes	As an alternative to this proposal and in order to assuage the concerns expressed, we would like to investigate with ELEXON alternative and fully independent solutions for collecting proving data. This would be a considered approach to the perceived issues rather than the overly heavy handed solution proposed here.
RWE npower plc	No	-
ScottishPower	No	-
SSE Energy Supply Limited	No	-
TMA Data Management Ltd	No	-
Western Power Distribution	No	-

### CP redlined text

Two comments were received on the BSCP502 and BSCP514 draft redlined text for CP1450 which can be found under question 2.