

CP Consultation Responses

CP1450 'Security Requirements for CoP10 Metering Equipment'



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
ScottishPower	2/1	Supplier
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	✗	✓	✓	✗
E.ON Energy Solutions Limited	✓	✗	✗	✓
IMServ	✓	✓	✗	✓
ScottishPower	✓	✗	✗	✓
SSE Energy Supply Limited	✓	✗	✗	✓
TMA Data Management Ltd	✓	✓	✓	✓
Western Power Distribution	✓	✗	✗	✓

Question 1: Do you agree with the CP1450 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
7	1	0	0

Responses

Respondent	Response	Rationale
British Gas	Yes	-
EDF Energy	No	Whilst we recognise SVGs view that the security requirements of SMETS are superior to that of COP10 requirements, we do not believe elective Half Hourly under the current arrangements are beneficial for domestic and SME Metering Systems. Even though the barrier for elective Half Hourly Settlement would be removed further barriers that impact Customers could arise. If another Supplier gained a Metering System in this instance and was not able to settle Half Hourly, additional costs would be incurred as a result of the Change of Measurement Class required. These costs may be passed back to Customers.
E.ON Energy Solutions Limited	Yes	-
IMServ	Yes	No specific objections.
ScottishPower	Yes	Yes, it seems a sensible approach to make sure that Metering Systems that are SMETS compliant also meet the CoP10 security requirements.
SSE Energy Supply Limited	Yes	We are supportive of this solution as it provides clarity that SMETS2 meters will comply with the security arrangements in BSC CoP10. We note that SMETS2 has changed since the closure of Issue 48 in 2013, which concluded that a comparison between SMETS2 and CoP requirements should be revisited. Given the changes to SMETS2 it seems prudent to complete this comparative exercise to ensure the BSC Guidance 'BSC Codes of Practice and Smart Meters' remains accurate and that any possible risks to settlement are clearly understood. It would also provide an opportunity to consider other relevant documentation, such as the GB Companion Specification and to seek views from BEAMA and EUA as part of this review. We understand SRAG are looking at the far broader

Respondent	Response	Rationale
		issue of how SMETS2 meters could be utilised to record HH settlement data and the end-to-end process (inclusive of DCC) so as to understand the remaining barriers to elective HH settlement for SMETS2 meters.
TMA Data Management Ltd	Yes	We fully support the removal of a barrier to the possible HH settlement of Smart Meters.
Western Power Distribution	Yes	-

Question 2: Do you agree that the draft redlining delivers the CP1450 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
8	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	-
E.ON Energy Solutions Limited	Yes	-
IMServ	Yes	The approach and logic seems sensible – No specific objections.
ScottishPower	Yes	Yes, the redlining covers the proposed change.
SSE Energy Supply Limited	Yes	-
TMA Data Management Ltd	Yes	-
Western Power Distribution	Yes	-

Question 3: Will CP1450 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
3	5	0	0

Responses

Respondent	Response	Rationale
British Gas	No	-
EDF Energy	Yes	Yes, indirectly as the consequential impact of this removal of barrier could lead to system changes in order to process a Change of Supplier where the Metering System is currently settled Half Hourly.
E.ON Energy Solutions Limited	No	-
IMServ	Yes	Although the exact scenarios have not been defined we expect that as an MOP and DC we will at some point be affected by SMETSII security in COP10 Meters.
ScottishPower	No	-
SSE Energy Supply Limited	No	-
TMA Data Management Ltd	Yes	As a HHDC, we may have to carry out BSCP601 for smart Meters.
Western Power Distribution	No	-

Question 4: Will your organisation incur any costs in implementing CP1450?

Summary

Yes	No	Neutral/No Comment	Other
2	6	0	0

Responses

Respondent	Response	Rationale
British Gas	No	-
EDF Energy	Yes	Potentially as an indirect result of another Supplier choosing to settle these Metering Systems Half Hourly.
E.ON Energy Solutions Limited	No	-
IMServ	No	No known costs at this point, may change.
ScottishPower	No	-
SSE Energy Supply Limited	No	-
TMA Data Management Ltd	Yes	The cost associated with CP1450 will be as and when BSCP601 testing is carried out. It will be absorbed by normal operation.
Western Power Distribution	No	-

Question 5: Do you agree with the proposed implementation approach for CP1450?

Summary

Yes	No	Neutral/No Comment	Other
7	1	0	0

Responses

Respondent	Response	Rationale
British Gas	Yes	-
EDF Energy	No	As previously discussed we have concerns with elective Half Hourly Settlement.
E.ON Energy Solutions Limited	Yes	-
IMServ	Yes	-
ScottishPower	Yes	Yes, proposed implementation date of Feb 2016 is reasonable
SSE Energy Supply Limited	Yes	-
TMA Data Management Ltd	Yes	-
Western Power Distribution	Yes	-

Question 6: Do you have any further comments on CP1450?

Summary

Yes	No
1	7

Responses

Respondent	Response	Comments
British Gas	No	-
EDF Energy	No	-
E.ON Energy Solutions Limited	No	-
IMServ	Yes	While this seems a sensible approach, for us it does also leave some unanswered questions, for example... 1) If SMETS Meters are to operate as HH then presumably password details will be transferred via a D0268? 2) If a D0268 is used what values will be populated Outstation Password Level 1 & 2 (optional, fields can be blank)? 3) Could this affect interoperability, if a customer chooses a different agent will new agent be able interface with SMETSII hardware?
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 CoP10 or BSCP601 draft redlined text for CP1450.