

CP1458 'Introduction of timescales for the P283 Commissioning process for SVA CT operated Metering Systems'



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About This Document

The purpose of this Change Proposal (CP) Consultation for CP1458 v2.0 is to invite BSC Parties, Party Agents and other interested parties to provide their views on the impacts and the merits of CP1458 v2.0. The Supplier Volume Allocation Group (SVG) will then consider the consultation responses before making a decision on whether or not to approve CP1458 v2.0.

There are seven 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.
- Attachment A contains the CP1458 v2.0 Proposal Form.
- Attachment B contains a diagram detailing the proposed timescales for CP1458 v2.0.
- Attachment C contains ELEXON responses to the comments raised as part of the original CP1458 Consultation.
- Attachments D and E contain the proposed redlined changes to deliver the CP1458 v2.0 solution.
- Attachment F contains the specific questions on which we seek your views. Please use this form to provide your response to these questions, and to record any further views or comments you wish to be considered.

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Approved Modification P283

[Approved Modification P283 'Reinforcing the Commissioning of Metering Equipment Processes'](#) was implemented on 6 November 2014. The Modification placed Commissioning obligations on the equipment owner, shifting responsibility for Commissioning of Measurement Transformers from the Meter Operator Agent (MOA) to the Licensed Distribution System Operator (LDSO) (or Transmission Company where applicable). It also placed an obligation on the MOA to inform the Registrant of the Commissioning status for each Metering System.

Under P283, MOAs retain responsibility for assessing the overall accuracy of the Metering System. Introducing an obligation for the MOA to communicate the Commissioning status of a Metering System to the Registrant of that Metering System (typically the Supplier) was intended to ensure that the Supplier had a complete picture of the status of its Half Hourly (HH) portfolio. The Supplier could then take corrective action where there was a gap in the Commissioning process.

What is the Technical Assurance of Performance Assurance Parties?

Technical Assurance of Performance Assurance Parties (TAPAP) is a detective technique in ELEXON's [Performance Assurance Framework \(PAF\)](#). The aim of TAPAP is to determine where Parties are meeting their BSC obligations and to identify weakness in the BSC processes (and other processes as appropriate). TAPAP checks are targeted at key market performance and risk areas on an annual basis, usually highlighted through the BSC Audit.

TAPAP checks for P283 processes

During the period of January – March 2015, ELEXON performed a TAPAP check on the P283 process and its implementation. This check was done for new Metering Systems installed for HH Measurement Class 'C' (Mandatory 100kW or above HH metered) on or after 6 November 2014. This was carried out across LDSOs, HHMOAs and Suppliers. Performing the check soon after implementation meant that we could identify breakdowns in the process early, and take action to resolve these. The findings were presented to the Performance Assurance Board (PAB) at its meeting on 23 April 2015 ([PAB171/05](#)).

Following this TAPAP check, ELEXON set up a workgroup and met with members of the original Code of Practice (CoP) 4 guidance group, which was created during the implementation of P283. This first meeting took place in August 2015 where initial timescales were proposed.

After the results of the 2014/15 P283 TAPAP check, the PAB requested that ELEXON performed another check on the P283 Commissioning processes under the same scope. The second check was performed during September – November 2015 and the results were presented to the PAB at its meeting on 17 December 2015 ([PAB179/06](#)). The findings from both TAPAP checks can be found on the [Technical Assurance of Performance Assurance Parties](#) page of our website. Both checks highlighted a need for timescales throughout the end-to-end P283 Commissioning process.

A second workgroup meeting took place in January 2016 (following the findings report presented to PAB179 in December) which also included representatives from some of the

What is Commissioning?

Commissioning is a series of tests and checks, used to demonstrate that Metering Equipment complies with the relevant Code of Practice and is therefore working properly. Any failures identified during the Commissioning process must be addressed before the Metering System becomes effective in Settlement.

Parties and Party Agents involved in the checks. This was to ensure that the timescales were still fit for purpose following the second set of findings.

What is the issue?

[Balancing and Settlement Code \(BSC\) Section L2.3.2](#) states that the Registrant must make 'all reasonable endeavours' to commission before energisation. However, it does not specify in what timescales Commissioning and its related activities should be completed. Current practices mean that the amount of time taken to commission their Metering Equipment and respond to communications is at the discretion of the Party or Party Agent. This communication includes, and is not restricted to, current transformer (CT) and voltage transformer (VT) Calibration Certificates, Commissioning records for each piece of Metering Equipment and notifications to the Supplier of the Commissioning status of the Metering System.

ELEXON and members of the timescales workgroup agreed a set of timescales and this Change Proposal (CP) has been raised to incorporate these into the current processes.

Proposed solution

[CP1458 'Introduction of timescales for the P283 Commissioning process for SVA CT operated Metering Systems'](#) was raised by ELEXON on 16 February 2016.

Following the first CP1458 Consultation and further ELEXON internal discussions, the CP1458 solution has been amended to remove of the Non-Half Hourly (NHH) requirements. Further to this, the solution has been clarified in the redlining and an updated process diagram produced. ELEXON has also included its responses to the original CP1458 Consultation replies in Attachment C. As this is a material change from that originally consulted upon, we have re-issued this CP for a further consultation.

CP1458 v2.0 seeks to introduce timescales for activities performed during the Commissioning process and for the communications obligations introduced under P283. These timescales apply only to the Supplier Volume Allocation (SVA) market and CT operated Metering Systems.

The proposed timescales relate to the LDSO, MOA and Supplier activities. To ensure that the process is completed within a reasonable timescale, and is completed before incorrect data can enter Settlement, timescales have been built around the:

- 'live' energisation status in the Supplier Meter Registration Service (SMRS); and
- Settlement Run timescales for the Initial Settlement Run (SF).

The overall process should take no longer than 26 Working Days.

Attachment B's diagram shows the proposed timescales for CP1458 v2.0. It is only illustrative of when the LDSO owns the Measurement Transformers; slightly different timescales will apply when these are not owned by a BSC Party. In this case the MOA will perform the Commissioning but the total time taken for the end-to-end process will be the same.

Proposer's rationale

During the recent TAPAP checks, we witnessed long delays in Commissioning where the Metering System had already become energised in SMRS. This presents a high risk to Settlement. We therefore used a month as a benchmark to judge whether 'all reasonable endeavours' to commission before energisation had been made as detailed in BSC Section L2.3.2. This benchmark was used to consider the time between the Metering System Identifiers (MSIDs) becoming live and data entering SF with the view that this would be the point at which there would be a risk to Settlement. If the Party or Party Agents had made a number of attempts to perform the work then this was classed as 'reasonable'. However, if no attempt was made, this was not classed as 'reasonable'. This approach was supported by the PAB.

In the worst case, a Metering System was left without being commissioned for up to ten months after energisation. Of the total sample, 50% of LDSO sites and 49% of MOA sites had not been commissioned at all or within a reasonable timescale.

The introduction of timescales into [BSC Procedure \(BSCP\) 514 'SVA Meter Operations for Metering System Registered in SMRS'](#) and [BSCP515 'Licensed Distribution'](#) will set a standard for Commissioning timescales. Furthermore, it will set a standard for the sending

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and receiving of communications for each relevant Party or Party Agent for the installation and Commissioning of its Metering Systems. Feedback from industry during the TAPAP checks also indicated that timescales were welcomed in order for the process to be performed efficiently.

CP Consultation Question

Do you agree with the CP1458 v2.0 proposed solution?

Please provide your rationale.

We invite you to give your views using the response form in Attachment F

Proposed redlining

Attachments D and E contain the proposed changes to BSCP514 and BSCP515 to deliver CP1458 v2.0.

CP Consultation Question

Do you agree that the draft redlining delivers the CP1458 v2.0 proposed solution?

If 'No', please provide your rationale.

We invite you to give your views using the response form in Attachment F

3 Impacts and Costs

Central impacts and costs

Central impacts

CP1458 v2.0 will require changes to BSCP514 and BSCP515.

In addition, we will include a housekeeping update to BSCP514 Section 2.4.1 a). It currently contains a requirement for the MOA to send Commissioning information to the HH Data Collector (DC) upon any change of Meter Technical Details (MTDs), any change of associated DC or upon the MOA's appointment to an SVA Metering System. The Commissioning information is of no use to the HHDC and is not a requirement in any process. This obligation is therefore redundant and needs to be removed

No system changes are required to implement this CP and there will be no impact on BSC Agents.

Central costs

The central implementation costs for CP1458 v2.0 will be approximately £240 (one ELEXON man day) to implement the relevant document changes.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none">BSCP514BSCP515	<i>None</i>

BSC Party & Party Agent impacts and costs

CP1458 v2.0 is expected to impact Suppliers, LDSOs (including Independent Distribution Network Operators (IDNOs)) and MOAs. We believe that minor process changes will be required to implement the solution but we will confirm this through the CP Consultation.

No other BSC Parties or Party Agents are expected to be impacted.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
Suppliers	Changes will be required to implement the solution.
LDSOs	
IDNOs	
MOAs	

CP Consultation Questions

Will CP1458 v2.0 impact your organisation?

If 'Yes', please provide a description of the impact(s) on your organisation and any activities which you will need to undertake between the approval of CP1458 v2.0 and the CP1458 v2.0 Implementation Date (including any necessary changes to your systems, documents and processes). Where applicable, please state which of the roles that you operate as will be impacted and any differences in the impacts between each role.

Will your organisation incur any costs in implementing CP1458 v2.0?

If 'Yes', please provide details of these costs, how they arise and whether they are one-off or on-going costs.

We invite you to give your views using the response form in Attachment F

4 Implementation Approach

Recommended Implementation Date

CP1458 v2.0 is proposed for implementation on **3 November 2016** as part of the November 2016 BSC Systems Release.

The November 2016 Release is the next available Release that can include this CP.

Tackling the Commissioning issues raised by the TAPAP checks is currently part of the [BSC Panel Strategic Work Programme](#). Having looked at the recent TAPAP check results, the PAB is also keen to implement this change as soon as possible.

CP Consultation Question

Do you agree with the proposed implementation approach for CP1458 v2.0?

Please provide your rationale.

We invite you to give your views using the response form in Attachment F

5 Initial Committee Views

SVG's initial views

The SVG considered CP1458 at its meeting on 1 March 2016 ([SVG181/06](#)).

An SVG Member noted some concerns over the repeat escalation process if Commissioning information is not received from the MOA. ELEXON advised that it is including a footnote in the draft redlined text for BSCP515 to clarify this concern. This will specify that if multiple Supplier escalations have been made to the LDSO with no response, the Supplier has the option to inform its Operational Support Manager (OSM) at ELEXON and then the PAB. However, ELEXON will try and resolve the issue before escalating to the PAB.

An SVG Member queried whether any timescales for Commissioning were agreed as part of P283. ELEXON advised that BSC Section L was not changed leaving it open to the Registrant to make 'all reasonable endeavours' to commission before energisation. It also noted that no timescales were included as part of BSCP514 or BSCP515 leaving them open to interpretation.

The SVG was updated on CP1458 and subsequent CP1458 v2.0 at its meeting on 31 May 2016 (SVG184). At this meeting, the SVG was made aware of the amendments to the CP1458 solution and supporting documentation. The SVG also noted the re-Consultation under CP1458 v2.0.

Appendix 1: Glossary & References

Acronyms

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

Acronyms	
Acronym	Definition
BSC	Balancing and Settlement Code (<i>Industry Code</i>)
BSCP	Balancing and Settlement Code Procedure (<i>Code Subsidiary Document</i>)
CoP	Code of Practice
CP	Change Proposal
CPC	Change Proposal Circular
CT	current transformer
DC	Data Collector (<i>Party Agent</i>)
HH	Half Hourly
IDNO	Independent Distribution Network Operator (<i>BSC Party</i>)
LDSO	Licensed Distribution System Operator (<i>BSC Party</i>)
MOA	Meter Operator Agent (<i>Party Agent</i>)
MSID	Metering System Identifier
MTD	Meter Technical Details
NHH	Non-Half Hourly
OSM	Operational Support Manager
PAB	Performance Assurance Board (<i>Panel Committee</i>)
PAF	Performance Assurance Framework
SF	Settlement Run
SMRS	Supplier Meter Registration Service
SVA	Supplier Volume Allocation
SVG	Supplier Volume Allocation Group (<i>Panel Committee</i>)
TAPAP	Technical Assurance of Performance Assurance Parties
VT	voltage transformer

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	P283 page on the ELEXON website	https://www.elexon.co.uk/mod-proposal/p283/

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External Links		
Page(s)	Description	URL
2	Performance Assurance Framework page on the ELEXON website	https://www.elexon.co.uk/reference/market-compliance/performance-assurance/performance-assurance-techniques/
2	PAB 171 page on the ELEXON website	https://www.elexon.co.uk/meeting/pab-171/
2	PAB 179 page on the ELEXON website	https://www.elexon.co.uk/meeting/pab-179/
2	TAPAP page on the ELEXON website	https://www.elexon.co.uk/reference/market-compliance/audits/technical-assurance-of-performance-assurance-parties/
3	BSC Sections page on the ELEXON website	https://www.elexon.co.uk/bsc-related-documents/balancing-settlement-code/bsc-sections/
4	CP1458 page on the ELEXON website	https://www.elexon.co.uk/change-proposal/cp1458/
4	BSCPs page on the ELEXON website	https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/
6	BSC Panel Strategy on the ELEXON website	https://www.elexon.co.uk/group/the-panel/
8	SVG181 page on the ELEXON website	https://www.elexon.co.uk/meeting/svg-181/