

## CP1462 'Allow the CDCA to break and remake Metering Equipment seals to access local interrogation port'



### Contact

**Giulia Barranu**

020 7380 4330

[giulia.barranu@elexon.co.uk](mailto:giulia.barranu@elexon.co.uk)



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### About This Document

This document is the Change Proposal (CP) 1462 Final CP Report which ELEXON has published following the final decision from the Imbalance Settlement Group (ISG) to approve CP1462.

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 ISG's views on the proposed changes and the views of respondents to the CP Consultation, along with the final decision on whether to approve this change.
- Attachments A and B contain the approved redlined changes to deliver the CP1462 solution.
- Attachment C contains the full responses received to the CP Consultation.

CP1462  
Final CP Report

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Version 1.0

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# 1 Why Change?

## The role of the Central Data Collection Agent

The Central Data Collection Agent (CDCA) is responsible for collecting, or procuring the collection of, metered data from Central Volume Allocation (CVA) registered Metering Systems by either remote or on-site interrogation. The CDCA interrogates almost all CVA Metering Systems remotely. However, in the event of any fault of any communications link (or any error, or omission, in metered data, or all necessary data not being available from Outstations), the CDCA is required, under [Section R1.4.3 of the Balancing and Settlement Code \(BSC\)](#), to collect, or procure the collection of, metered data by on-site interrogation.

## Who is responsible for sealing Metering Equipment?

Approved Modification Proposal [P190 'Removal of the obligation on the CDCA to provide witnessing and sealing service in respect of all Metering Equipment associated with CVA Metering Systems'](#) removed the obligation on the CDCA to break seals and witness 'before' and 'after' Meter readings. The rationale for the Modification was to improve efficiency by removing the need for both the CDCA and the Meter Operator Agent (MOA) to be onsite at the same time whilst sealing Metering Equipment. P190 therefore removed the obligation on the CDCA to reseal Metering Equipment after work (routine or faults), allowing the MOA to do it whilst on site. The CDCA was also previously required to attend the site to seal newly installed Metering Equipment or reseal existing Metering Equipment where a seal was broken by the CVA MOA or operational staff at a site in an operational emergency. Since P190 was implemented the responsibility for providing a sealing service sits solely with the CVA MOA and specifically excludes the CDCA.

## What is the issue?

With certain CVA Metering System Outstations a seal(s) has to be broken in order to access the Outstation's local interrogation port to download metered data.

Where a communications link has not yet been installed for a new Metering System or there is a communications link fault, the CDCA can, with the agreement of the Registrant, break a seal(s) to access the Outstation's local interrogation port and download the metered data.

The issue is that, since P190, if the CDCA has to break a seal to download metered data it has to leave the Outstation's local interrogation port unsealed until the CVA MOA attends the site to reseal the Outstation's local interrogation port. The period in which the Outstation's local interrogation port remains unsealed could be several months as the CVA MOA may wait until the communication line(s) is(are) repaired by a third party. The Outstation's local interrogation port is password protected so the risk to Settlement of leaving the local Outstation's interrogation port unsealed is very low. However, sealing the Outstation's local interrogation port immediately after downloading metered data would improve the efficiency of the process by reducing CVA MOA costs and completing all the work in one visit.

### Approved solution

[CP1462 'Allow the CDCA to break and remake Metering Equipment seals to access local interrogation port'](#) was raised by ELEXON on 9 May 2016.

To avoid the unnecessary expense of the CVA MOA attending sites to reseal the Outstation's local interrogation port (or other seals which are required to be broken to get to the Outstation's local interrogation port), this CP changes [BSC Procedure \(BSCP\) 06 'CVA Meter Operations for Metering Systems Registered in CMRS'](#) to allow the CDCA to break and remake seals, where necessary, in order to carry out on-site interrogation of Outstations.

ELEXON holds a central register of all CVA MOA sealing pliers and will issue the CDCA with unique sealing plier IDs. The CDCA will be required to maintain its own register of sealing pliers detailing when, to whom and which unique pair(s) of sealing pliers has been issued for use by its operatives. The register will also specify details of any lost or stolen pliers, any pliers sent for repair (the CDCA shall ensure that records relating to repairs are kept for at least 10 years), and the dates on which any sealing pliers were destroyed.

Additionally, the CDCA will ensure that its register of sealing pliers is made available for inspection by the BSC Auditor.

The CDCA will discuss with the Registrant and the CVA MOA the need to attend the site to carry out a local interrogation of the Outstation and agree the frequency of visits. In the event that the CDCA needs to break a Metering Equipment seal(s) to access the local interrogation port and interrogate the Outstation(s), the CDCA shall reseal the Metering Equipment immediately afterwards. The CDCA will update the on-site register of seals applied form. The CDCA will then notify the CVA MOA (and Registrant, if required) that a seal has been broken and remade. The CDCA shall include the following details in the notification:

- the Metering System ID (MSID);
- the circuit name;
- the Metering Equipment sealed;
- the date the seals were applied;
- the sealing pliers ID and number; and
- the name of the CDCA operative who applied the seal(s).

The CVA MOA will update its local copy of the 'register of seals applied' form.

In following this process, the CVA MOA (and Registrant) can maintain an audit trail for the Metering System. The CDCA shall also keep a copy of the notification for audit purposes.

When requested, ELEXON will provide the Technical Assurance Agent (TAA) with an updated copy of the central register of sealing pliers which details the company/role to whom a sealing pliers ID is assigned and the effective from date (and any effective to date) for the sealing pliers ID.

## Proposer's rationale

In the event of a fault of any communication link the CDCA tends to rely on the Registrant to provide it with actual metered data (downloaded locally by the CVA MOA) or estimates or substituted values in accordance with [BSCP03 'Data Estimation and Substitution for Central Volume Allocation'](#) for use in Settlement.

CP1462 proposes to allow the CDCA to break and remake seals and then notify the Registrant and the CVA MOA where seals have been broken and remade.

This will<sup>1</sup>:

- provide a more efficient process for sealing Metering Equipment; and
- reduce the chance of the TAA identifying non-compliances due to broken seals.

In addition the risks of leaving Metering Equipment unsealed would be reduced further.

## Approved redlining

Attachments A and B contain the approved changes to BSCP06 and the CDCA Service Description to deliver CP1462.

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<sup>1</sup> The Proposer's original rationale, as set out in the CP Consultation document, stated that part of the rationale for the change was that it would allow the CDCA to use greater volumes of metered data in Settlement. One respondent to the Consultation pointed out that implementing this CP would not increase the amount of metered data in Settlement because the CDCA is already able to break the seal and obtain the metered data. We accept this point and have therefore not included it as part of the rationale in the CP Final Report. We also added the point 'reduce the chance of the TAA identifying non-compliances due to broken seals' to the rationale section to make it more explicit.

### 3 Impacts and Costs

#### Central impacts and costs

CP1462 will require changes to BSCP06. The central implementation costs for CP1462 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"><li>BSCP06</li><li>CDCA Service Description</li></ul>	None

No system changes are required. However, the CDCA will need to order sealing pliers which are marked differently from those used by CVA MOAs. These will cost approximately £475 for four sets of sealing pliers for the CDCA operatives. No other costs are expected for changing CDCA processes or training in order to deliver the sealing service.

CP1462 also updates the CDCA Service Description to reintroduce the requirement to break and remake the seal(s) to download metered data.

The TAA will also have to update its documents and/or the TAA Working Instruction to acknowledge that the CDCA will be sealing certain Metering Equipment and providing it with details of the Meters and seals broken and resealed. The TAA will need to confirm the sealing pliers ID against the Central Sealing Pliers Register which we will provide a copy of to it.

#### BSC Party & Party Agent impacts and costs

CP1462 will impact CVA MOAs and Registrants of CVA Metering Systems. Minor process changes will be required for these participants to implement the solution. This was confirmed through the CP Consultation, with one CVA MOA also noting minor costs to implement this CP. One respondent of the CP Consultation noted that from MOA perspective there is no objection to the implementation of CP1462. The only action that the MOA will take is to provide a memo to National Grid notifying it of the proposed change. You can find the full responses in Attachment C.

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

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
CVA MOAs	Changes is required to implement the solution
Registrants	

## 4 Implementation Approach

### Approved Implementation Date

CP1462 is approved 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.

All six respondents to the CP Consultation agreed with this proposed Implementation Date.

## 5 Initial Committee Views

### ISG's initial views

The ISG considered CP1462 at its meeting on 21 June 2016 ([ISG182/01](#)).

An ISG Member questioned the number of site visits that a CVA MOA carries out. We responded that the CDCA relies on the Registrant of a Metering System to provide data when data may not be downloadable remotely. We estimated that around one to two percent of sites incur a site visit.<sup>2</sup> An ISG member questioned whether the CDCA had the resource to attend site visits, to which we responded that the CDCA does and that it will create a Local Working Instruction (LWI) in due course.

An ISG Member questioned whether Registrants are causing delays. We noted that the requirement is for the CDCA to go to site and obtain data where it cannot be obtained remotely, and that this is not currently taking place. We added that it is fortunate that there have not been any issues as yet in relation to obtaining data from the Registrant.

An ISG Member questioned whether the BSCP06 redlined text had considered notifying the Registrant in advance that the CDCA will require access to the site. We considered that the BSCP06 redlined text requires the CDCA to agree a schedule of visits with the Registrant. We believe it is an option available to the Registrant that the CDCA notifies them in advance prior to each visit and we do not believe the redlined text needs to be modified to mandate that the CDCA notifies the Registrant prior to each visit.

The ISG did not ask for any additional questions to be added to the CP Consultation.

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<sup>2</sup> ELEXON can further clarify that the number of sites experiencing problems with their data communication lines at any given time can vary between one or two sites or as many as 10, but it is unpredictable. The duration of the problem can also vary from days to months. The number of site visits needed to retrieve metered data locally will depend on the type of Outstation and its capacity to store metered data.

## 6 Industry Views

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

Summary of CP1462 CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1462 proposed solution?	6	1	0	0
Do you agree that the draft redlining delivers the intent of CP1462?	6	1	0	0
Will CP1462 impact your organisation?	3	4	0	0
Will your organisation incur any costs in implementing CP1462?	1	6	0	0
Do you agree with the proposed implementation approach for CP1462?	7	0	0	0
Do you have any further comments on CP1462?	1	6	0	0

### Comments on the CP

Six of the seven respondents agreed with the CP proposed solution. One respondent confirmed no objections to the CDCA breaking the seal(s) in order to interrogate the meter as long as the seal is replaced and the on-site register is updated with details of the broken seal.

One respondent disagreed with the rationale of the CP when it says that CP1462 will provide more efficient process for sealing Metering Equipment and will allow the CDCA to use greater volumes of actual metered data from CVA Metering System in Settlement. In fact, the CDCA is currently able to break seals and obtain metered data regardless of the outcome of the CP. We acknowledge this comment. The respondent also believed that if the CVA MOA is not currently making any "special" trips to reseal Metering Equipment seals, then there would be no cost-savings arising from this change, and therefore no value in this CP. ELEXON do not have any information available to assess to what extent this is currently happening. However there is a requirement in BSCP06 on the CVA MOA to reseal Metering Equipment on the same day as the work on the Metering Equipment is completed following routine work or a fault. If this is not currently happening, then the CVA MOA would be non-compliant with BSCP06 section 3.1.4. Implementing this CP would avoid the need for a CVA MOA to visit the site on the same day as the CDCA. We believe this is preferable to attempting to enforce CVA MOAs to do so as this would result in increased cost and inefficiency.

Furthermore, the respondent believes that under this CP, extra steps would be introduced to the process whereby the CDCA has to notify the CVA MOA that a seal has been broken and remade. The CVA MOA would then update its local copy of the register of seals applied form and keep a record of the notification. This will require participants updating their business processes for the additional steps involved. In addition, the respondent noted that CP1462 states two registers would have to be kept, one for the CDCA and one for the CVA MOA. Therefore, there would be additional cost for the BSC Auditor to audit



both registers. ELEXON advised that BSC Auditor should not check any equipment or any role they are auditing, and this is a data based exercise. Therefore, we do not believe the BSC Auditor would be affected by the CP.

The respondent concluded that changes should only be made if there is a recognised benefit and they do not consider that any benefit has been identified under this CP. Noting this, we would consider that there is a benefit in reducing the risks that could arise from leaving Metering Equipment unsealed.

Three of the seven respondents indicated they will be impacted by CP1462 and only one respondent will incur low cost to implement this CP.

## Comments on the proposed redlining

One respondent believed that the interface and timetable did not clarify that the CDCA has to update the on-site register. Whilst this is explained elsewhere, it should form part of the process in 3.4.5 of BSCP06. We agree with this and have clarified the BSCP06 redlined text to refer to the CDCA updating the 'local on-site register' of seals applied.

One respondent made a minor clarification comment to BSCP06 Section 12 A1(b), suggesting to insert "a" between arise and result: "will normally arise as a result". We consider this a sensible suggestion, and have updated the BSCP06 redlining accordingly.

### ISG's final views

The ISG considered CP1462 at its meeting on 23 August 2016 ([ISG184/05](#)).

An ISG Member noted that the Proposer's rationale for CP1462 had changed between its Progression Paper and the CP Assessment Report. They were concerned that this was a significant change and should have been made clear in the CP Assessment Report. This was particularly important as the rationale in the Assessment Report isn't the same as the rationale the industry was consulted on.

ELEXON agreed this could have been clearer. They explained the change was made following consideration of consultation responses which challenged ELEXON's original rationale.

ELEXON accepted the challenge and made the changes to the rationale explicit in the Final CP Report.

An ISG Member queried if the CDCA originally could reseal Metering Equipment, but a Modification, P190, meant it did not have to do it. ELEXON explained that the Modification removed a requirement, which meant that both the CDCA and the MOA had to be there on the same day, which at the time was deemed to be inefficient. The aim of CP1462 is to provide the CDCA with the ability to reseal a Meter to avoid the need for both the CDCA and MOA to visit the site and to reduce risks to the integrity of the Meter if it is left unsealed, whilst waiting for the MOA to reseal it. ELEXON clarified to the ISG that both the CDCA and MOA would have the ability to reseal a Meter.

### Final decision

The ISG has:

- **APPROVED** CP1462 for implementation on 3 November 2016 [as part of the November 2016 BSC Systems Release].

## 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> )
CDCA	Central Data Collection Agent ( <i>BSC Agent</i> )
CVA	Central Volume Allocation
CP	Change Proposal
CPC	Change Proposal Circular
HHU	Hand Held Unit
ISG	Imbalance Settlement Group ( <i>Panel Committee</i> )
LIU	Local Interrogation Unit
LWI	Local Working Instruction
MOA	Meter Operator Agent ( <i>Party Agent</i> )
MSID	Metering System ID
TAA	Technical Assurance Agent ( <i>BSC Agent</i> )

### 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, 3, 4	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>
2	P190 page on the ELEXON website	<a href="https://www.elexon.co.uk/mod-proposal/p190-removal-of-the-obligation-on-the-cdca-to-provide-a-witnessing-and-sealing-service-in-respect-of-all-metering-equipment-associated-with-cva-metering-systems/">https://www.elexon.co.uk/mod-proposal/p190-removal-of-the-obligation-on-the-cdca-to-provide-a-witnessing-and-sealing-service-in-respect-of-all-metering-equipment-associated-with-cva-metering-systems/</a>
3	CP1462 page on the ELEXON website	<a href="https://www.elexon.co.uk/change-proposal/cp1462/">https://www.elexon.co.uk/change-proposal/cp1462/</a>
8	ISG182 page on the ELEXON website	<a href="https://www.elexon.co.uk/meeting/isg-182/">https://www.elexon.co.uk/meeting/isg-182/</a>
10	ISG182 page on the ELEXON website	<a href="https://www.elexon.co.uk/meeting/isg-184/">https://www.elexon.co.uk/meeting/isg-184/</a>

