

# CP Assessment Report

## CP1472 'Removal of SVA proving tests for Meters with a pulse multiplier of one'

**ELEXON**



### Committee

Supplier Volume Allocation  
Group / Imbalance  
Settlement Group

### Recommendation

Approve

### Implementation Date

23 February 2017  
(February 2017 Release)



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## Contents

<b>1</b>	Why Change?	<b>2</b>
<b>2</b>	Solution	<b>4</b>
<b>3</b>	Impacts and Costs	<b>5</b>
<b>4</b>	Implementation Approach	<b>6</b>
<b>5</b>	Initial Committee Views	<b>7</b>
<b>6</b>	Industry Views	<b>8</b>
<b>7</b>	Recommendations	<b>10</b>
	Appendix 1: Glossary & References	<b>11</b>
	Appendix 2: Detailed comments on draft redlining with ELEXON response	<b>13</b>

## About This Document

This document is the Change Proposal (CP) Assessment Report for CP1472 which ELEXON will present to the Supplier Volume Allocation Group (SVG) and Imbalance Settlement Group (ISG) at their meetings on 3 January 2017 and 24 January 2017 respectively. The SVG and ISG will consider the proposed solution and the responses received to the CP Consultation before making a decision on whether to approve CP1472.

There are five 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 and ISG's initial views on the proposed changes and the views of respondents to the CP Consultation.
- Attachments A, B and C contain the proposed redlined changes to deliver the CP1472 solution.
- Attachment D contains the full responses received to the CP Consultation.

SVG191/05

CP1472  
CP Assessment Report

19 December 2016

Version 1.0

Page 1 of 15

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# 1 Why Change?

## Background

During the 2014/15 Audit year, the Balancing and Settlement Code (BSC) Auditor identified an Audit Issue<sup>1</sup> that proving tests are not being performed and/or communicated. The subsequent recommendation was for ELEXON to hold a workgroup with Half Hourly Meter Operator Agents (HHMOAs) to ensure requirements for the completion of proving tests are explicit.

ELEXON established this workgroup in December 2015. It consisted of representatives from five HHMOAs, one Half Hourly Data Collector (HHDC), and the Association of Meter Operators (AMO). The workgroup discussed how to make the proving test requirements explicit. This discussion led to the workgroup questioning the need for proving tests and their value to Settlement. This CP represents the conclusions of the workgroup and ELEXON.

## Proving tests

A proving test is a requirement for the HHMOA to confirm that the HHDC is correctly interpreting data from Meters. This process confirms that the HHDC has the correct pulse multiplier in its system to convert the data into kWh for Settlement.

The proving test process originated when older mechanical type Meters were always connected to separate Outstations. The Outstation would automatically store a count of pulses from the Meters connected to it on a Half Hourly (HH) basis and then the HHDC would collect that data from the Outstation. However, most Outstations did not convert the pulse counts into kWh, so the HHDC was required to do this using a pulse multiplier. The HHMOA provides the pulse multiplier to the HHDC via the [D0268 'Half Hourly Meter Technical Details'](#) data flow. The value of pulse multiplier is based upon the type of Meter and its capacity. The HHMOA must look up the pulse multiplier in a data table provided by the Meter manufacturer and enter it into the D0268. For a given Meter, the table could contain several different pulse multipliers, one of which is selected by the HHMOA depending on the capacity of the circuit to be measured. This process is manual and prone to human error.

Most modern Meters have an in-built Outstation, which stores the consumption data directly in kWh so there is no need to convert this data for use in Settlement. For most (but not all) of these Meters with the in-built Outstation, the pulse multiplier value is always one. This means it is much less likely for the HHMOA to make an error when selecting the correct pulse multiplier from the table as all the values in the table are one. Across the HH market in Supplier Volume Allocation (SVA), around 90% or more of Meters have a pulse multiplier fixed at one.

The workgroup and ELEXON unanimously agreed that there is no benefit to Settlement of proving Metering Systems that can only ever have a pulse multiplier of one unless they are sending signals to a separate Outstation or are involved with Complex Sites.



### Outstation

Outstation means equipment which receives and stores data from a Meter(s) for the purpose of transfer of that metering data to a Data Collector. It may perform some processing before such transfer and may be one or more separate units or may be integral with the Meter.

SVG191/05

CP1472

CP Assessment Report

19 December 2016

Version 1.0

Page 2 of 15

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<sup>1</sup> <https://www.elexon.co.uk/reference/market-compliance/audits/bsc-audit/>

## What is the issue?

The workgroup agreed that it is very rare for a proving test to fail because of an incorrect pulse multiplier. Analysis of proving test records carried out by the workgroup members (see Appendix 2) revealed that none have failed for reasons that cause incorrect data to enter Settlement. There are failures due to the HHDC providing data from an incorrect day or not being able to provide data due to communication failures, etc. The workgroup estimated that a proving test costs around £55 to carry out (HHDC £25, HHMOA £25 and Supplier £5). ELEXON has established that between 1 April 2015 and 31 March 2016 there were 25,936 requests for proving tests across the industry. Of these, 20,100 (77%) had a pulse multiplier of one. The approximate cost of these proving tests (for Meters with a pulse multiplier of one) is £1.1m per year. We expect that around 90% of these Meters can only possibly have a pulse multiplier of one. Therefore the expected wasted cost to industry is around £990k per year.

The workgroup has given careful consideration to the risks and benefits to Settlement of both proving and not proving Meters in SVA. The workgroup believes that the opportunity for error being introduced into Settlement by the incorrect application of a pulse multiplier is very minimal for any pulse multiplier. Furthermore it believes that the potential for error where the pulse multiplier of the Meter is one is even smaller. The workgroup believes that metering technologies have improved to a point that makes the need for proving mostly irrelevant and it believes that SVA proving tests offer little benefit for Settlement, particularly if the pulse multiplier is and can only be one.

## Impact for P272 'Mandatory Half Hourly Settlement for Profile Classes 5-8'

The need to prove Meters under [P272 'Mandatory Half Hourly Settlement for Profile Classes 5-8'](#) could delay the process of moving Meters from Non Half Hourly (NHH) to HH. The workgroup believes implementing this CP as early as possible would assist in the migration of Meters from NHH to HH.

## Complex Sites

The validation of Complex Sites is higher risk due to the implicit manual completion of the Complex Site information by the HHMOA and the manual configuration required by the HHDC. The proposal is to strengthen the requirements to check the HH aggregated consumption data which may identify errors which would result in incorrect Settlement and customer billing.

The workgroup considered the current proving test requirements for Complex Sites as defined in BSC Procedures (BSCPs) [514 'SVA Meter Operations for Metering Systems Registered in SMRS'](#) and [502 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'](#) and, in summary, concluded that there is no overall process that verifies the complex mapping is correct. The workgroup believes that a new process would greatly provide the missing assurances needed for these arrangements.



### Complex Sites

'Complex Site' means any site that requires a 'Complex Site Supplementary Information Form' to enable the HHDC to interpret the standing and dynamic Metered Data relating to SVA Metering Systems for Settlement purposes to be provided to the HHDC in addition to the D0268 'Half Hourly Meter Technical Details'.

SVG191/05

CP1472

CP Assessment Report

19 December 2016

Version 1.0

Page 3 of 15

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### Proposed solution

It is proposed that a proving test is not required for integral Meter/Outstations that have a fixed pulse multiplier of one unless the Metering Equipment is part of a Complex Site or is connected to a separate Outstation. Redlined changes to BSCP514 and BSCP502 remove the need for the HHMOA and HHDC to carry out a proving test where the pulse multiplier can only be one (as identified on the list of approved Meters) and the Meter is not connected to a separate Outstation or part of a Complex Site arrangement. This CP does not propose changing the requirements for Central Volume Allocation (CVA) Proving Tests which are set out in [BSCP02 'Proving Test Requirements for Central Volume Allocation Metering Systems'](#).

Changes to [BSCP601 'Protocol Approval and Compliance Testing'](#) will make it a requirement for the Compliance Testing Agent (as defined in BSCP601) to establish the pulse multiplier ranges of new Outstations. ELEXON currently maintains a list of approved Meters/Outstations. We will indicate on this list which Meters/Outstations can only have a pulse multiplier of one and, under normal circumstances, do not require a proving test.

A new process is proposed for BSCP514 and BSCP502 called a Complex Site Validation Test. This new process would be very similar to a proving test but will require the HHDC to provide the HHMOA with a single HH reading that has been processed in accordance with the complex mapping. In this way the HHMOA will be able to verify if the HHDC has properly interpreted the complex aggregation for the site as a whole.

### Proposer's rationale

This change is required to address an issue identified by the BSC Auditor. The proposed solution will remove a process that is adding little value to Settlement and avoid waste resources across the industry. In addition the new Complex Site Validation Test will add extra assurance.

### Proposed redlining

Attachments A, B and C contain the proposed changes to BSCP502, BSCP514 and BSCP601 respectively to deliver CP1472.

We presented CP1472 to the SVG on 4 October 2016 and the ISG on 25 October 2016. The Committee Members had no initial comments on the redlining.

We are presenting CP1472 to the SVG and ISG for decision because BSCP601 which is impacted by this change is jointly owned. BSCP502 and BSCP514 are owned by SVG only.

### 3 Impacts and Costs

#### Central impacts and costs

This change will require document changes only.

There are no system changes required for this CP and no impact on BSC Agents.

The maintenance of the list of approved Meters/Outstations that do not require a proving test will be absorbed in ELEXON business as usual (BAU) costs.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none"><li>BSCP502</li><li>BSCP514</li><li>BSCP601</li></ul>	<i>None</i>

The central implementation costs for CP1472 will be approximately £240 (one ELEXON working day) to implement the necessary document changes.

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

We expect that HHMOAs and HHDCs will be impacted by the implementation of CP1472.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
HHMOA	<ul style="list-style-type: none"><li>Stop performing SVA proving tests for Meters with a pulse multiplier of 1</li><li>Verify processed HH readings from the new Complex Site Validation Test</li></ul>
HHDC	<ul style="list-style-type: none"><li>Stop performing SVA proving tests for Meters with a pulse multiplier of 1</li><li>Follow the new processes for HH readings for the Complex Sites Validation Test</li></ul>

Four HHMOAs who responded to the CP Consultation indicated they would need to implement system changes if CP1472 were approved. One other HHMOA indicated they would not be impacted.

Two HHDCs indicated that their systems would be impacted, however other HHDCs indicated no or minor impacts, such as updating their procedures.

Suppliers indicated no impact or minor impacts to update processes.

No impacts on other Party or Party Agent roles were identified in the responses to the CP Consultation.

SVG191/05

CP1472

CP Assessment Report

19 December 2016

Version 1.0

Page 5 of 15

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## 4 Implementation Approach

### Recommended Implementation Date

We propose to implement CP1472 on **23 February 2017** as part of the February 2017 BSC Release.

The February 2017 Release is the next available Release that can include this CP.

### CP Consultation respondents' views on Implementation Date

As noted in section 3, four out of five HHMOAs which responded to the CP Consultation indicated they would need to make system changes. Two respondents to the consultation indicated that a February Implementation Date would not be possible, as the necessary system changes would not be possible in the time frame. It was noted by one of these respondents that they use a system which is provided by a third party and that several other HHMOAs use the same system. They advised that an Implementation Date of 29 June 2017 would be achievable.

ELEXON contacted the all respondents who were supportive of the February date to ask if they would also be supportive of a June 2017 Implementation Date. One respondent was also supportive of June and indicated that this change of date would not cause any problems for their organisation. However, four others (three HHMOAs and one Supplier) would still prefer a February date. One participant commented that removing the requirement for proving tests in February would significantly help the migration of Meters from NHH to HH under P272.

ELEXON has considered the implications of both a February 2017 and June 2017 Implementation Date. We believe that, on balance, a February Implementation Date would bring the greatest benefit to the industry as a whole. We acknowledge that some HHMOAs will not be able to make the system changes in time for February. However we believe that there is no disadvantage to the industry, or risk to Settlement, if those HHMOAs continue to request proving tests and if the HHDC continues to perform them until their system changes are in place. Continuing to perform proving tests that are not required would not be considered a non-compliance. We believe this approach provides the benefit to those who are able to make the necessary changes by February and does not disadvantage those who are unable to make changes by February.

However, organisations which do not make the system changes by February would still have to ensure they have the ability to perform the Complex Site Validation Test, as this would be an obligation from the Implementation Date.

### SVG's initial views

The SVG considered CP1472 at its meeting on 4 October 2016 ([SVG 188/05](#)).

An SVG Member commented that HHMOAs and HHDCs often use the same platform and they believe, in such cases, proving tests add little value. This Member questioned the need for proving tests at all. An ELEXON representative confirmed that this CP will remove the proving test requirement for majority of SVA Metering Systems that are currently in use but there will be some systems that do require proving tests including Complex Sites, Meters where the pulse multiplier is not always one and some older Meters that do not have an inbuilt Outstation. An SVG Member commented that there are very few Meters with a separate Outstation and their use is declining.

An SVG Member noted that, over recent years, there have been several CPs relating to proving tests and asked whether there are likely to be any more. ELEXON confirmed we do not expect any more proving test related CPs in the near future.

SVG Members did not request any additional questions to be added to the CP Consultation.

### ISG's initial views

The ISG considered CP1472 at its meeting on 25 October 2016 ([ISG 186/01](#)).

Several ISG Members raised concerns that proving tests actually perform a wider purpose than purely confirming the value of the pulse multiplier, for example establishing working communications between the Metering System and the HHDC. ELEXON responded that there is a data validation process set out in BSCP502 which would identify any communication issues and places an obligation on the HHMOA to investigate it. ELEXON noted that when proving tests were first introduced they did indeed have a broader role but since validation tests were introduced, the only practical purpose they serve now is to confirm the value of the pulse multiplier.

After the meeting ELEXON contacted the ISG Members to highlight to them that in CVA the role of a Proving Test is somewhat different to SVA proving tests. For CVA, [BSCP02 'Proving Test Requirements for Central Volume Allocation Metering Systems'](#) gives a definition for Proving Tests which does include a requirement to establish communications. However this is not the term that is referred to in BSCP502 for SVA. BSCP502 does not explicitly define the term proving test.

An ISG Member questioned the figure of £55 as the cost of a proving test. They believed that it could be lower than this as proving tests are often combined with another reason to visit a site, such as installation.

The ISG requested that two additional questions be included in the CP Consultation, on the cost of a proving test and on any risk to Settlement. The full responses to these questions can be found in Attachment D.



## 6 Industry Views

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

Summary of CP1472 CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1472 proposed solution?	7	1	1	0
Do you agree that the draft redlining delivers the intent of CP1472?	7	1	1	0
Will CP1472 impact your organisation?	6	2	1	0
Will your organisation incur any costs in implementing CP1472?	5	3	1	0
Do you agree with the proposed implementation approach for CP1472?	6	2	1	0
Do you agree that the proposed Complex Site Validation Test will reduce the risk of Settlement Error?	8	0	1	0
Do you agree with the workgroup's cost estimate for proving tests of £55?	6	0	3	0
Do you believe that by removing SVA proving tests, as proposed by CP1472, there is any increase in risk to Settlement?	1	7	1	0
Do you have any further comments on CP1472?	2	7	0	0

### Consultation respondents views on the proposed solution

Of nine respondents to the CP Consultation, seven agreed with the proposed solution. One respondent did not answer this question. One respondent answered 'no' to this question but in their written response stated: 'Although we agree with the solution it is worth noted that Proving Tests can also detect errors such as the wrong measurement quantity or power flow being registered by the MOA and issued via the D268 to the HHDC. However such cases are likely to be very low in number terms.' ELEXON notes that the validation process would identify measurement quantity or power flow errors.

### Responses to other consultation questions

All the respondents who answered the question on whether the proposed Complex Site Validation Test would reduce the risk of Settlement Error agreed that it would.

None of the respondents disagreed with the workgroup's estimate of £55 as the cost of a proving test.

On the question 'Do you believe that by removing SVA proving tests, as proposed by CP1472, there is any increase in risk to Settlement?', of the eight respondents who

SVG191/05

CP1472  
CP Assessment Report

19 December 2016

Version 1.0

Page 8 of 15

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answered this question seven answered 'no'. The one respondent who answered yes believes that proving tests can detect errors such as incorrect measurement quantity or power flow. However this respondent acknowledged that the risk would be small. As noted in the section above ELEXON notes that such errors will identified by the validation process.

### **In progress proving tests**

One respondent questioned whether proving test that are in progress at the time of implementation would be expected to be carried out. ELEXON's view is that from the Implementation Date onward no proving tests are required for Meters with a pulse multiplier of one with an inbuilt outstation and is not part of a Complex Site arrangement. This would not be affected by a situation in which the process had already begun.

### **Comments on the proposed redlining**

Several respondents provided comments on the draft redlining. We have updated the redlining to BSCP502 and BCSP514 to add clarifications or corrections but the intent of the solution is unchanged. Full details on the respondents' comments and our responses are given in appendix 2.

We have not made any changes to BSCP601 following the consultation.

## 7 Recommendations

We invite you to:

- **AGREE** the amendments to the proposed redlining for BSCP502 and BSCP514 for CP1472 made following the CP Consultation;
- **APPROVE** the proposed changes to BSCP502, BSCP514 and BCP601 for CP1472; and
- **APPROVE** CP1472 for implementation on **23 February 2017** as part of the February 2017 Release.
- **NOTE** that CP1472 will also be presented to the ISG on 24 January 2017 for decision.

## Appendix 1: Glossary & References

### Acronyms

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

Acronyms	
Acronym	Definition
AMO	Association of Meter Operators
BAU	Business as usual
BSC	Balancing and Settlement Code ( <i>industry Code</i> )
BSCP	BSC Procedure
CP	Change Proposal
CVA	Central Volume Allocation
HH	Half Hourly
HHDC	Half Hourly Data Collector
HHMOA	Half Hourly Meter Operator Agent
ISG	Imbalance Settlement Group ( <i>Panel Committee</i> )
NHH	Non Half Hourly
SVA	Supplier Volume Allocation
SVG	Supplier Volume Allocation Group ( <i>Panel Committee</i> )

### 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	<a href="#">Half Hourly Meter Technical Details</a>

### 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	BSC Audit Report 2015/16	<a href="https://www.elexon.co.uk/reference/market-compliance/audits/bsc-audit/">https://www.elexon.co.uk/reference/market-compliance/audits/bsc-audit/</a>
3	P272 webpage	<a href="https://www.elexon.co.uk/p272-mandatory-half-hourly-settlement-profile-classes-5-8/">https://www.elexon.co.uk/p272-mandatory-half-hourly-settlement-profile-classes-5-8/</a>
3	BSCP514 webpage	<a href="https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/5/?show=10&amp;type">https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/5/?show=10&amp;type</a>

SVG191/05

CP1472

CP Assessment Report

19 December 2016

Version 1.0

Page 11 of 15

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External Links		
Page(s)	Description	URL
3	BSCP502 webpage	<a href="https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/4/?show=10&amp;type">https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/4/?show=10&amp;type</a>
4 and 7	BSCP02 webpage	<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>
4	BSCP601 webpage	<a href="https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/7/?show=10&amp;type">https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/7/?show=10&amp;type</a>
7	SVG meeting 188 webpage	<a href="https://www.elexon.co.uk/meeting/svg-188/?from_url=https://www.elexon.co.uk/events-calendar-item/svg-188/">https://www.elexon.co.uk/meeting/svg-188/?from_url=https://www.elexon.co.uk/events-calendar-item/svg-188/</a>
7	ISG meeting 186 meeting webpage	<a href="https://www.elexon.co.uk/meeting/isg-186/?from_url=https://www.elexon.co.uk/events-calendar-item/isg-186/">https://www.elexon.co.uk/meeting/isg-186/?from_url=https://www.elexon.co.uk/events-calendar-item/isg-186/</a>

## Appendix 2: Detailed comments on draft redlining with ELEXON response

Comments on the CP1472 Proposed Redlining		
Document & Location	Comment	ELEXON's Response
BSCP502 Page 1	The red line update has been performed against v25.0 but the current version is v26.0 will this have any impact?	No, there are no conflicts with the changes implemented in version 26.
BSCP502 3.5	This makes reference to 3.5.7 but no such section exists, think this should be 3.5.6	Agree, this change has been made.
BSCP502 3.5.6.2	The reference should be '...for the day requested in 3.5.6.1'	Agree, this change has been made.
BSCP502 3.5.6.2	How should the HHDC re-act if the Complex form isn't available at the time the Proving Request is made? Experience has shown that these often lag behind any registration or metering activity. Typically, the HHDC would be estimating data at this point. A pre-condition of having received a valid Complex Mapping form from the HHMO should be added here	There is already an existing requirement for the MOA to provide the Complex Site Supplementary Information Form within 5 WD of installation and commissioning of the Metering System (3.2.1.3 of BSCP502).
BSCP502 3.5.6.2	Has consideration been made for Third Party Access sites trading under BSCP550, how would these be handled, is a D0003 appropriate in all cases? Should such sites also require Proving, i.e. treated like Complex sites?	If a site is complex, a Complex Site Validation Test is required regardless of Third Party Access issues.
BSCP502 3.5.6.2	Since these sites are Complex, is 5 working days enough time to resolve differences such as those noted above?	ELEXON believe 5 WD would be sufficient in the majority of cases, however there will always be some exceptions. We believe 5 WD should be that standard timeframe for this process.
BSCP502 4.6	What is the change control process around the 'compliance and protocol approval list'? How would HHDCs and HHMOs know this list had changed and therefore the type of Outstation to be Proved had changed? Other than the fact I can see the current	There is already an existing email notification process for updates to the compliance and protocol approval list for interested parties. We would expect that when a HHDC is appointed to a new Meter, they would use the list as a reference point.

SVG191/05

CP1472  
CP Assessment Report

19 December 2016

Version 1.0

Page 13 of 15

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Comments on the CP1472 Proposed Redlining		
Document & Location	Comment	ELEXON's Response
	version is 47, we can't see any other version control information such as effective date, what had changed from last time,. References to CPs that caused it to be changed etc.	
BSCP502 4.6.1	Why would a Proving test be required where the Complex Status was being removed?	To ensure it is no longer "complex" in HHDC systems.
BSCP502 4.6.1	Not sure the 'and' is required in the line: "Where a feeder is energised for the first time; and." This implies that both of the conditions need to be met i.e. feeder is energised for the first time and site is Complex. All those bullet points have an implies 'or' to them	Agree, we have changed the wording to "Where a feeder is energised for the first time; or" as suggested and also added the words 'any of' at the top of the list.
BSCP502 3.5 Proving a Metering System <sup>1, 2</sup> .	Suggest that the sub-heading should also reference Appendix 4.9 Guide to Complex Sites: <b>3.5 Proving a Metering System<sup>1, 2</sup>.</b> <u>Complex Sites are subject to Complex Site Validation test as set out in 3.5.7. and as referenced in Appendix 4.9 Guide to Complex Sites</u>	Agree, this change has been made.
BSCP502 3.5 Proving a Metering System <sup>1, 2</sup> .	Footnote should be amended to <sup>2</sup> MS assigned to Measurement Class F are exempt from proving tests ( <u>except where part of a Complex Site</u> )	Agree, although we have used the wording 'except for Complex Sites which are subject to the Complex Site Validation Test'.
BSCP502 3.5.6.2	"Information required" states <u>"Email with aggregated consumption data for the day requested in 3.5.6.2"</u> Should this read 3.5.6.1?	Agree, this change has been made.
BSCP502 3.5.6.6	Action required states <u>"Investing discrepancy with MOA and resolve and re-validate. Proceed to 3.4.6.1"</u> Typo – "Investing" should read "Investigate" "MOA" should read "HHDC"	Agree, these changes have been made.

SVG191/05

CP1472  
CP Assessment Report

19 December 2016

Version 1.0

Page 14 of 15

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Comments on the CP1472 Proposed Redlining		
Document & Location	Comment	ELEXON's Response
BSCP502 4.6.2 Methods of Proving	<u>"The HHMOA shall decide from method 1 to 4 <del>what</del> which method of proving test is appropriate in conjunction with the HHDC. Complex Sites shall always be proved using the Complex Validation Test."</u> Typo – remove "what"	Agree, this change has been made.
BSCP514 Page 1	The red line update has been performed against v30.0 but the current version is v32.0 will this have any impact?	No, there are no conflicts with the changes implemented in version 32.
BSCP514 8.3.1	See comment for 4.6.1 of BSCP502	Agree, we have changed the wording to "Where a feeder is energised for the first time; or" as suggested and also added the words 'any of' at the top of the list.
BSCP514 5.5 Proving a Metering system <sup>1,2</sup>	Suggest that the sub-heading should also reference Appendix 8.4 Guide to Complex Sites: <b>5.5 Proving a Metering System<sup>1, 2</sup>.</b> <u>Complex Sites are subject to Complex Site Validation test as set out in 5.5.6. and as referenced in Appendix 4.9 Guide to Complex Sites</u>	Agree although the reference should be to 8.4. The following wording has been added 'and as referenced in Appendix 8.4 Guide to Complex Sites.'
BSCP514 5.5 Proving a Metering system <sup>1,2</sup>	Footnote should be amended to <sup>2</sup> MS assigned to Measurement Class F are exempt from proving tests <u>(except where part of a Complex Site)</u>	Agree, although we have used the wording 'except for Complex Sites which are subject to the Complex Site Validation Test'.
BSCP514 5.5.6.7	<u>"Investing discrepancy with HHDC and resolve. Proceed to 5.5.6.1."</u> Typo – "Investing" should read "Investigate"	Agree, this change has been made.