

CP Consultation Responses

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



This CP Consultation was issued on 7 November 2016 as part of CPC00771, with responses invited by 2 December 2016.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
E.ON Energy Solutions	1/0	Supplier
IMServ Europe Ltd	0/2	HHMOA, HHDC
Npower Group PLC	1/2	Supplier, HHMOA, HHDC
ScottishPower	0/1	HHMOA
Siemens Managed Services	0/2	HHMOA, HHDC
SSE Energy Supply Limited	1/2	Supplier, HHMOA, NHHMOA
Stark	0/4	HHDC, HHDA, NHHDC, NHHDA
TMA Data Management Ltd	0/4	HHDC, HHDA, NHHDC, NHHDA
Western Power Distribution	1/0	Distributor

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
E.ON Energy Solutions	✓	✓	✗	✓
IMServ Europe Ltd	✗	✓	✓	✗
Npower Group PLC	✓	✓	✓	✗
ScottishPower	✓	✗	✗	✓
Siemens Managed Services	✓	✓	✓	✓
SSE Energy Supply Limited	✓	✓	✓	✓
Stark	✓	✗	✗	✓
TMA Data Management Ltd	✓	✓	✓	✓
Western Power Distribution	-	-	-	-

Question 1: Do you agree with the CP1472 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
7	1	1	0

Responses

Respondent	Response	Rationale
E.ON Energy Solutions	Yes	We support the proposed solution. Proving test failures are rare for meters with a pulse multiplier of 1, and subsequently the removal of proving tests for meters with a pulse multiplier of 1 would have a positive impact on costs and resources. As most modern meters now have inbuilt outstations with automatic converters, proving test are no longer as essential as they once were. One proviso of supporting this proposal from a supplier perspective is that agents are obliged to carry out their actions correctly, and ensures that the correct process is being followed. If a specific meter is commissioned correctly, we cannot envisage there being any issue with removing the proving test in line with the intent of this proposal.
IMServ Europe Ltd	No	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. One of the justifications given for raising this CP and it's short lead time, is as consequence of the large volume of Proving Tests being triggered by CoMC for P272 migration and that this could lead to delays. By the time this CP is likely to come into effect, the deadline for conclusion of the P272 migration will be very close so the vast majority of sites will have migrated.. Therefore the CP will be of limited benefit and should be treated as a lower priority and given a less urgent implementation deadline.
Npower Group PLC	Yes	Currently proving is a time consuming and costly process which, for meters that have a non-variable pulse multiplier of 1, offer no discernible benefit to either the customer or to settlement. The research conducted by the workgroup has shown that proving tests do not fail due to an

Respondent	Response	Rationale
		incorrect pulse multiplier and indeed no evidence of D0268s being changed (in regards to pulse multipliers) following a failed proving test could be found across multiple meter operator businesses. By removing the requirement to prove the applicable meters resource and cost can be distributed to areas that are of higher risk to settlement/customer journey.
ScottishPower	Yes	Agree with the proposed solution
Siemens Managed Services	Yes	We agree that there is no benefit to be gained by Proving meters where there is an integral Outstation and the Pulse Multiplier is fixed at one. As the workgroup has demonstrated these meters pass the Proving Test in all but a very small number of cases. Removing the Proving Test requirement from these meters will allow Agents to focus their resources on the Proving of Complex sites, where the likelihood of an error in configuration is greater and so is the potential impact on Settlement.
SSE Energy Supply Limited	Yes	We fully support the proposed solution. It removes the requirement for completing proving tests where it does not add value, (pulse multiplier is one), and improves the robustness of the process where it does add value (complex sites). We are pleased that following analysis and expert discussion, the working group and Elexon share the view that there is no benefit to Settlements for completing a proving test where the pulse multiplier is one. We agree with the reasons articulated in the change proposal on why proving tests (w/pulse multiplier of 1) do not add value. As noted back when CP1448 'Changes to allowable software for Method 3 Proving Tests' at the start of 2016, where the HHMOA and HHDC are the same company operating the same software, the Proving Test is actually 'proving' anything. We are also supportive of the inclusion of the Complex Site Validation Test, which appears robust and an improvement on the existing arrangements.
Stark	Yes	With little added value removing this obligation this will improve speed of process.
TMA Data Management Ltd	Yes	We fully support a move from general meter proving criteria to targeted higher risk categories

Respondent	Response	Rationale
		criteria.
Western Power Distribution	[No response]	We are neutral as no impact on our DNO business however, note comments on red-lined documentation below.

Question 2: Do you agree that the draft redlining delivers the CP1472 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
7	1	1	0

Responses

A summary of the specific responses on the draft redlining can be found at the end of this document.

Respondent	Response	Rationale
E.ON Energy Solutions	Yes	[None]
IMServ Europe Ltd	No	Please see our specific comments on the BSCPs below
Npower Group PLC	Yes	[None]
ScottishPower	Yes	Agree that the draft redlining supports proposed solution
Siemens Managed Services	Yes	[None]
SSE Energy Supply Limited	Yes	[None]
Stark	Yes	[None]
TMA Data Management Ltd	Yes	[None]
Western Power Distribution	[No response]	[None]

Question 3: Will CP1472 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
6	2	1	0

Responses

Respondent	Response	Rationale
E.ON Energy Solutions	Yes	We envisage minor process changes to facilitate this change.
IMServ Europe Ltd	Yes	As HHDC – a small amount of development work will be required to identify incoming requests for Complex sites and to support sending aggregated data to the HHMO for these. Some development work may be required to support issuing aggregated data to the HHMO in a mutually acceptable format. As HHMO – Significant development work will be required in order to suppress the appropriate sites that no longer require a Proving Test and to ensure Complex sites are triggered for Proving. Again, some development work may be required to support processing aggregated data from the HHDC.
Npower Group PLC	Yes	Both HHMOP and HHDC processes will need amending to reflect that for meters with a non-variable pulse multiplier of 1 a proving test is no longer required. As a HHMOP there will also be changes required to our system. Currently a proving test is triggered automatically on the population of a commissioning date into the system. System changes will be required to add validation so that the automatic D0005 is not triggered for the applicable outstation types but is still triggered for the meter that require proving. We do not anticipate there will be any system changes required from a HHDC perspective.
ScottishPower	No	No Impact expected as a result of this proposed change
Siemens Managed Services	Yes	We will need to carry out a detailed Impact Assessment to determine the modifications that are required to prevent the meters being loaded into our Proving Test application that is used by HHMOA. However this does not need to be done prior to the CP1472 Implementation Date as the Application has

Respondent	Response	Rationale
		the functionality to filter the meters so that they will not be progressed through the Application. Processes and documentation will need to be updated to reflect that as an outcome of this CP that Proving will be only on what will be referred to as the Complex Site Validation Test.
SSE Energy Supply Limited	Yes	There is minimal work to be completed to implement the Complex Site Validation Test process. We expect to see a reduction in agency costs due to proving tests no longer being completed where they do not add value. This proposal will also support the ongoing delivery of P272 because a proving test will not be required on every Change of Measurement Class event.
Stark	No	Admin only to remove an unnecessary process, and change the procedure for another.
TMA Data Management Ltd	Yes	As HHDC, our procedures and systems will be impacted by CP1472.
Western Power Distribution	[No response]	[None]

Question 4: Will your organisation incur any costs in implementing CP1472?

Summary

Yes	No	Neutral/No Comment	Other
5	3	1	0

Responses

Respondent	Response	Rationale
E.ON Energy Solutions	No	[None]
IMServ Europe Ltd	Yes	As HHDC – as stated there will be: • A one off development cost • An amount of testing • A small one off documentation and training activity • A small ongoing running cost (assumed on the basis of low volumes of Complex sites that would need to be Proved) As HHMO – as stated there will be: • Significant impact on our HHMO system requiring third party development work to support • Significant testing • A small one off documentation and training activity • A small ongoing running cost (assumed on the basis of low volumes of Complex sites that would need to be Proved) • Our software provider has not yet had sufficient time to identify the amount of development required to support this and so we cannot give an indication of cost at this point
Npower Group PLC	Yes	There will be costs associated with the system changes described in our answer to question 3.
ScottishPower	No	No expected costs associated with implementation
Siemens Managed Services	Yes	One-off costs to modify the Application, processes and documentation as outlined in the response to Question 3.
SSE Energy Supply Limited	Yes	Minor one-off costs to implement the Complex Site Validation Test process as detailed in BSCP514 and BSCP502.

Respondent	Response	Rationale
Stark	No	None
TMA Data Management Ltd	Yes	There will be medium one off costs and a lowering of operational costs associated with the Meter Proving process.
Western Power Distribution	[No response]	[None]

Question 5: Do you agree with the proposed implementation approach for CP1472?

Summary

Yes	No	Neutral/No Comment	Other
6	2	1	0

Responses

Respondent	Response	Rationale
E.ON Energy Solutions	Yes	We agree with the approach as outlined in the change proposal and support the proposed implementation date.
IMServ Europe Ltd	No	As HHDC – we are very unlikely to be able to deliver these new requirements by 23/02/17 based on an approval date of 24/01/17. A June implementation is possible, however. As HHMO – It is unlikely that the required development, testing and implementation work can be achieved based on approval on 24/01/17 with an implementation date of 23/02/17. A June 2017 release would be a challenging target with November being more realistic. We believe the required development work for the Third Party system used by ourselves and several other MOPS cannot be completed for the February date. This will affect multiple MOPs and subsequently all DCs, since they will continue to receive Proving requests, thus also potentially impacting downstream DC activities
Npower Group PLC	No	When we first proposed CP1472 we would have liked to have seen February as the implementation date to help ease activity over P272. However, due to the system changes required and the final approval date for the CP we now recognise that this may be unfeasible. We would recommend delaying the implementation date to the June 2017 release. We would like to stress that we are still 100% supportive of the intention of this change and would like to see it implemented at the earliest possible opportunity, however, February is probably now unfeasible.
ScottishPower	Yes	The proposed implementation date appears suitable

Respondent	Response	Rationale
Siemens Managed Services	Yes	As a Supplier Agent involved with the P272/322 migration we see benefits to be realised by the implementation of CP1472 as soon as is practical. The removal of the Proving Test will allow staff resources to focus on other parts of the CoMC process and increase the probability of achieving the P272 deadline.
SSE Energy Supply Limited	Yes	A February 2017 implementation date is achievable and will support the final delivery of P272 due to the providing tests no longer being necessary in most Change of Measurement Class events.
Stark	Yes	Good to implement as soon as possible.
TMA Data Management Ltd	Yes	[None]
Western Power Distribution	[No response]	[None]

Question 6: Do you agree that the proposed Complex Site Validation Test will reduce the risk of Settlement Error?

Summary

Yes	No	Neutral/No Comment	Other
8	0	1	0

Responses

Respondent	Response	Rationale
E.ON Energy Solutions	Yes	We agree that the proposal for Complex Site Validation Test is the best way forward due to its simplicity and the added assurance that such a process would add in terms of reducing the risk of settlement error. A HHDC would be able to adequately provide verification to the MOA that the complex aggregation of the site had been understood correctly.
IMServ Europe Ltd	Yes	The existing process does not provide the means to ensure a reduction in risk of Settlement error and never has. The HHMO needs to see both the meter level and aggregate level consumption in order to verify that the correct data enters Settlement. We are concerned that e-mail is the proposed transmission method between Parties but accept this is the most practical medium given the expected low volumes.
Npower Group PLC	Yes	The current version of BSCP 514/502 does not adequately describe the process that should be followed in regards to proving for complex sites. By clarifying the process and ensuring that the raw data is sent by the HHDC as well as a D0003, this ensures the aggregation rule itself is being proved and as this is what adds value in mitigating risk to settlement. As a result the new process is beneficial.
ScottishPower	Yes	We agree that the proposed Complex Site Validation Test will reduce the risk of Settlement Error
Siemens Managed Services	Yes	The proposed Complex Site Validation Test clarifies the existing requirements for Proving on Complex sites. Currently it is possible to confuse the Proving test requirements for Complex and non-complex sites. Having a separate section in the BSCP than is clearly labelled as testing on Complex sites removes any ambiguity.

Respondent	Response	Rationale
SSE Energy Supply Limited	Yes	It is a targeted process which proportionally manages the few Complex sites that exist in the market.
Stark	Yes	Due to their very nature, the risks of error are higher and so introducing a requirement to check on the DC's configuration & the HH aggregated consumption data, where one does not currently exist, should ultimately contribute to a reduction in the risk of Settlement error.
TMA Data Management Ltd	Yes	The proposed Complex Site Validation would ensure that the complex site calculation is set up correctly and therefore will help towards lowering the risk of Settlement Error.
Western Power Distribution	[No response]	[None]

Question 7: Do you agree with the workgroup's cost estimate for proving tests of £55?

Summary

Yes	No	Neutral/No Comment	Other
6	0	3	0

Responses

Respondent	Response	Rationale
E.ON Energy Solutions	Yes	[None]
IMServ Europe Ltd	N/A	We don't understand the relevance of this question.
Npower Group PLC	Yes	[None]
ScottishPower	Yes	We agree with this estimation
Siemens Managed Services	Yes	We are assuming that this cost in the average across SVA meters and Complex sites, where the unit cost will be greater.
SSE Energy Supply Limited	Yes	There is undoubtedly a cost associated with this process. Different companies will agree different agent costs, we hope it suffices to confirm that there would be a material cost saving and therefore this change is cost effective
Stark	Yes	This figure appears to be a reasonable estimate of the costs
TMA Data Management Ltd	[No response]	No comment
Western Power Distribution	[No response]	[None]

Question 8: Do you believe that by removing SVA proving tests, as proposed by CP1472, there is any increase in risk to Settlement?

Summary

Yes	No	Neutral/No Comment	Other
1	7	1	0

Responses

Respondent	Response	Rationale
E.ON Energy Solutions	No	As outlined in question 1, as most new meters have inbuilt outstations which convert the pulse multiplier data automatically, the risk of impacting settlement by removing the proving test is negligible.
IMServ Europe Ltd	Yes	As stated in Answer 1, there will be an increase in risk, but this increase should be small.
Npower Group PLC	No	As stated in our answer question 1, the analysis carried out by the working group seems to confirm that proving tests are not identifying any risk to settlement with regards to pulse multipliers. A proving test was designed for a situation in which meters and outstations were not integral and so a pulse multiplier was needed to ensure data was correctly recorded. For the outstation types that this CP applies to, the test is no longer relevant and adds no benefit to settlement - it is addressing a risk that is not present. A counter argument may be given that the proving test acts as a way of validating that the communications are working. This is not the job of a proving test. There is a defined faults process within BSCP514 and BSCP502 which highlights comms issues via a D0001.
ScottishPower	No	We do not believe removing the SVA proving test will increase the risk to settlement
Siemens Managed Services	No	The workgroup has demonstration using quantitative data that the success rate of Proving on the meters under consideration is very nearly 100%. We would agree with the conclusion that carrying out the Proving test does not add to in an improvement in Settlement. Therefore to remove the SVA proving tests does not increase the risk to Settlement.
SSE Energy Supply	No	With the exception of Complex Sites or those connected to a separate outstation, we are not

Respondent	Response	Rationale
Limited		convinced that the SVA proving tests are mitigating a settlement risk and therefore removing the requirement will not increase (or decrease) settlement risk.
Stark	No	The evidence is available in the proposal that indicates this is not the case.
TMA Data Management Ltd	No	From experience, the issues that caused incorrect data to enter settlement could not be found out through proving tests (CT/VT issues).
Western Power Distribution	[No response]	[None]

Question 9: Do you have any further comments on CP1472?

Summary

Yes	No
2	7

Responses

Respondent	Response	Comments
E.ON Energy Solutions	No	[None]
IMServ Europe Ltd	Yes	We accept this CP has some benefit. However, we believe the priority and implementation of this CP need to be re-assessed. It is unlikely that HHMOs in particular will be able to deliver to the proposed deadline and will not therefore be able to remove any delay in moving meters from NHH to HH because of this CP – P272 migration will have already been completed by the time they can.
Npower Group PLC	No	[None]
ScottishPower	No	[None]
Siemens Managed Services	Yes	What is the expectation on those Proving Tests related to CoMC jobs that are in progress at the time of CP1472 implementation? Would the Agent be expected to carry out the Proving even though it is no longer a BSCP requirement?
SSE Energy Supply Limited	No	[None]
Stark	No	[None]
TMA Data Management Ltd	No	[None]
Western Power Distribution	[No response]	[None]

BSCP502

Respondent	Location	Comment
IMServ Europe Ltd	Page 1	The red line update has been performed against v25.0 but the current version is v26.0 will this have any impact?
	3.5	This makes reference to 3.5.7 but no such section exists, think this should be 3.5.6
	3.5.6.2	The reference should be '...for the day requested in 3.5.6.1'
	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
	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?
	3.5.6.2	Since these sites are Complex, is 5 working days enough time to resolve differences such as those noted above?
	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 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.
	4.6.1	Why would a Proving test be required where the Complex Status was being removed?
	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
Western Power	3.5 Proving a	Suggest that the sub-heading should also reference

Respondent	Location	Comment
Distribution	Metering System ^{1, 2} .	Appendix 4.9 Guide to Complex Sites: 3.5 Proving a Metering System^{1, 2}. <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>
	3.5 Proving a Metering System ^{1, 2} .	Footnote should be amended to ² MS assigned to Measurement Class F are exempt from proving tests (<u>except where part of a Complex Site</u>)
	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?
	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"
	4.6.2 Methods of Proving	<u>"The HHMOA shall decide from method 1 to 4 what 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"

BSCP514

Respondent	Location	Comment
IMServ Europe Ltd	Page 1	The red line update has been performed against v30.0 but the current version is v32.0 will this have any impact?
	8.3.1	See comment for 4.6.1 of BSCP502
Western Power Distribution	5.5 Proving a Metering system ^{1,2}	Suggest that the sub-heading should also reference Appendix 8.4 Guide to Complex Sites: 5.5 Proving a Metering System^{1, 2}. <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>
	5.5 Proving a Metering system ^{1,2}	Footnote should be amended to ² MS assigned to Measurement Class F are exempt from proving tests (<u>except where part of a Complex Site</u>)
	5.5.6.7	<u>"Investing discrepancy with HHDC and resolve. Proceed to 5.5.61."</u> Typo – "Investing" should read "Investigate"