

CP Consultation Responses



CP1491 'Lack of clarification surrounding the timeliness of Proving Tests and relevant documentation for CVA MOA in BSCP02'

This CP Consultation was issued on 10 July 2017 as part of CPC00779, with responses invited by 04 August 2017.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Npower	3/0	Generator, Supplier and Non Physical Trader.
ScottishPower	0/1	Supplier Agent: MOA.
Siemens Managed Services	0/1	Supplier Agent: CVA MOA.
TMA Data Management Ltd	0/1	Supplier Agent: HHDC, HHDA, NHHDC & NHHDA.

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
Npower	✓	✓/✗	✗	✓
ScottishPower	✓	✗	✗	✓
Siemens Managed Services	✓/✗	✓	✓	✓
TMA Data Management Ltd	✓	✗	✗	✓

Question 1: Do you agree with the CP1491 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
3	0	0	1

Responses

Respondent	Response	Rationale
Npower	Yes	I agree with CP1491 – Allowing more clear timescales for CVA sites in regards to proving will ensure that the registrant / MOA will be able to understand and meet the targets set by the BSCP02.
ScottishPower	Yes	We feel that this proposal is a sensible step, especially due to the number of sites we have in rural locations.
Siemens Managed Services	Yes/No	The answer is yes subject of our comments being addressed.
TMA Data Management Ltd	Yes	

Question 2: Do you agree that the draft redlining delivers the CP1491 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
3	0	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
Npower	Yes	
Scottish Power	Yes	We agree with the draft redlining.
Siemens Managed Services	Yes/No	See comments below.
TMA Data Management Ltd	Yes	If ELEXON address comment on Section 3.2.3, which have been addressed.

Question 3: Will CP1491 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
1	2	0	1

Responses

Respondent	Response	Rationale
Npower	Yes/No	Changes to the relevant process for managing CVA will need to be looked into from the MOA and registrant in respect to timescale changes, due to this being a new change in the process a new write up from the business in regards to the working practices / processes will be required to be completed. This should take around 1 Working day. However due to the timescales been more clear and representative of the BSCP changes the impact will be minimal and will impact in a positive way.
ScottishPower	No	We do not believe this would have any impact on our organisation.
Siemens Managed Services	Yes	Budget for the additional task to carry out proving test when replacing like for like.
TMA Data Management Ltd	No	

Question 4: Will your organisation incur any costs in implementing CP1491?

Summary

Yes	No	Neutral/No Comment	Other
1	3	0	0

Responses

Respondent	Response	Rationale
Npower	No	
ScottishPower	No	We do not envisage any material costs at this stage.
Siemens Managed Services	Yes	Cost will be ongoing due to additional checks.
TMA Data Management Ltd	No	

Question 5: Do you agree with the proposed implementation approach for CP1491?

Summary

Yes	No	Neutral/No Comment	Other
4	0	0	0

Responses

Respondent	Response	Rationale
Npower	Yes	By having a more clear timescale and process layout in the BSCP will make improvements to the external and internal SLAs provided by Npower. Not only to the business but also to the customer. This will also be of benefit to the industry in regards to providing a correct response to our customers and also to Elexon within a timely manner and in accordance with the BSCP.
Scottish Power	Yes	We agree with the proposed approach for CP1491.
Siemens Managed Services	Yes	
TMA Data Management Ltd	Yes	

Question 6: Do you believe the BSCP02/4.4 'Confirmation of Installation of Metering Equipment (including Extension or Modification of Metering System)' holds any value particularly as the CVA MOA is not always responsible for installing and commissioning measurement transformers? Do you envision any risks or issues if this form was removed from BSCP02 as part of a separate CP?

Summary

Yes	No	Neutral/No Comment	Other
2	1	1	0

Responses

Respondent	Response	Rationale
Npower	Yes	I would see the potential risk that if a commission document was not provided there would not be a reason to confirm 100% accuracy for the metering. Likewise if the distributor does not provide the measurement transformers document the above remains the same also. If there was no Commissioning documents for the meter on site then there would be a risk to COP4 and the meter operators respective BSCP. However if you still obtain the CT information from the DNO you could potentially reduce the risk / issues of accuracy and commission the site metering providing there is enough load to commission / Inject at a further date.
Scottish Power	Yes	We are not fully comfortable in the removal of this document; however, we concede that it is not the ideal solution. We would prefer a solution similar to the approach in P283 where there is two parts to the document, Part 1 for the equipment owner to complete and Part 2 for the MOA.
Siemens Managed Services	No	Form 4.4 does not add any value. MOA is responsible for commissioning records and certificates already and checking under P283.
TMA Data Management Ltd	n/a	

Question 7: CP1472 'Removal of SVA proving tests for Meters with a pulse multiplier of one' removed the requirement in the SVA market to conduct a proving test for Meters with an integral Settlement Outstation that have a fixed pulse multiplier of 1. Do you believe that the same change should be implemented in the CVA market under BSCP02 as part of a separate CP? If the requirement to conduct a full proving test was removed for Meters with an integral Settlement Outstation that have a fixed pulse multiplier of 1, do you believe a sufficient replacement check should be a simple dial up test conducted by the CDCA with confirmation to the CVA MOA of success/failure?

Summary

Yes	No	Neutral/No Comment	Other
3	0	1	0

Responses

Respondent	Response	Comments
Npower	Yes	The removal of proving sites with a pulse multiplier of one was actioned as the metering to my knowledge was always within accuracy so there was no further requirement to prove the metering of the back of a successful commissioning. However I do believe if you can commission the metering from a MOA and DNO perspective then I don't see why you can't remove proving for sites with a pulse multiplier of one.
Scottish Power	Yes	We do not see this would cause any more risks in the CVA world.
Siemens Managed Services	Yes	Yes, the meters with integral data collector have actual MW values, i.e. no pulses or factors applied.
TMA Data Management Ltd	n/a	

Question 8: Do you believe that requiring a proving test to take place at least eight WDs before the Registration Effective From Date (REFD) of a Metering System is a sensible and correct timescale? If not, why not? How many WDs do you believe would be sensible and justifiable timescale to require a Proving Test to be carried out before the REFD of a Metering System, as part of a separate CP?

Summary

Yes	No	Neutral/No Comment	Other
3	1	0	0

Responses

Respondent	Response	Comments
Npower	Yes	I agree that over a week to prove before REFD is reasonable it would give the registrant enough time to carry out this work reducing the timescales from 15WD to 8 would mean that the relevant parties have more time to arrange for the work to be carried out and the timescales to be achieved, however this may lead to shorter notification of work to be completed from a customer perspective as things may be left last minute as opposed to sooner.
ScottishPower	Yes	We have no issues with the current set up.
Siemens Managed Services	No	Proving test to take place at least 8 WDs before REFD. This is largely out of CVA MOA control, MOA can only advise customers / industry participants about BSCP02 timescales, if access is provided to offshore installation and large generation projects for proving tests outside of SLA timescales MOA would perform proving tests when possible. Is 8WD required for settlement processes?
TMA Data Management Ltd	Yes	

Question 9. Do you have any further comments on CP1491?

Summary

Yes	No	Neutral/No Comment	Other
0	4	0	0

Responses

Respondent	Response	Comments
Npower	No	
ScottishPower	No	We have no further comments to add.
Siemens Managed Services	No	
TMA Data Management Ltd	No	

Responses

Respondent	Location	Comment
Siemens Managed Services	1.2d	Clarification required on what are relevant component parts of metering system (note this is not redlined)
Siemens Managed Services	3.7.2	This is confusing, suggests replacing an outstation when the title of this section is reprogramming of an outstation?
Siemens Managed Services	4.2a	Start and finish times are common also meter and outstation values are common. These forms need amending to be more efficient and user friendly.
TMA Data Management Ltd	3.2.3	Change the reference from "Before or on the same day as in 3.1.6 " to " Before or on the same day as in 3.2.6"