

CP Progression Paper

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

ELEXON



Committee

Imbalance Settlement Group



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Contents

1	Why Change?	2
2	Solution	4
3	Impacts and Costs	6
4	Implementation Approach	7
5	Proposed Progression	8
6	Recommendations	9
	Appendix 1: Glossary & References	10

About This Document

This document provides information on new Change Proposal (CP)1491 and outlines the proposed progression timetable for this change, including when it will be issued for CP Consultation in the next suitable Change Proposal Circular (CPC) batch.

We are presenting this paper to capture any comments or questions from the Imbalance Settlement Group (ISG) Members on this CP before we issue it for consultation.

There are three parts to this document:

- This is the main document. It provides a summary of the solution, impacts, anticipated costs, and proposed implementation approach, as well as our proposed progression approach for this CP.
- Attachment A contains the CP1491 proposal form.
- Attachment B contains the proposed redlined changes to deliver the CP1491 solution.

ISG195/07

CP1491
CP Progression Paper

19 June 2017

Version 1.0

Page 1 of 10

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1 Why Change?

Background

The Balancing and Settlement Code (BSC) Auditor conducted an audit of Central Volume Allocation (CVA) Meter Operator Agents (MOAs) during the audit period ending 31 March 2015. The Auditor identified an issue related to a lack of clarification regarding MOA BSC Procedure (BSCP) requirements ([BSC Auditor's Summary of Market Issues](#)). The issue relates to the requirements in, and documents related to, [BSCP 02 'Proving test requirements for Central Volume Allocation Metering Systems'](#). The nature of the issue is described in the following section 'What is the issue?'.

BSCP02 defines the minimum requirements for proving new, and changes to, existing CVA Metering Systems.

In order to maintain the integrity of Settlement every new CVA Metering System is required to go through a full end-to-end set of Commissioning tests (in accordance with [Code of Practice \(CoP\) 4 'Code of Practice for the calibration and commissioning requirements of Metering Equipment for Settlement purposes'](#)) and Proving Tests (in accordance with BSCP02). This must be done before the Registrant first registers the new Metering System for Settlement purposes in the Central Meter Registration Service (CMRS).

Commissioning tests are the minimum requirements necessary to establish that the Metering Equipment¹, comprised within a Metering System, is accurately measuring and recording the energy (consumption or generation) in an Outstation² at a Site.

As set out in the Introduction to BSCP02, the purpose of a Proving Test is to establish the following:

- The Meter Technical Details (MTDs) submitted by the MOA or the Registrant to the Central Data Collection Agent (CDCA), to enable data collection be complete, accurate and correctly transferred to the CDCA instation;
- The CDCA be able to interrogate the Metering System Outstation and satisfactorily retrieve the relevant metered data in the required format; and
- Prove that a Meter register advance [provided by the MOA to the CDCA] for a given Settlement Period is consistent with the metered data retrieved by the CDCA for that same Settlement Period.

The Commissioning organisation and/or MOA must complete all Commissioning tests before the CDCA and MOA carry out a Proving Test. The CVA MOA must complete all testing (including sealing the Metering Equipment) before the Settlement effective from date (EFD) of the new CVA Metering System. For a new CVA Metering System the CDCA and MOA must complete the Proving Test at least 8 Working Days (WDs) before the EFD of the Metering System.

Where a Registrant transfers an existing commissioned and proven Supplier Volume Allocation (SVA) Metering System from a Supplier Meter Registration Service (SMRS) to the CMRS, the CDCA and MOA must complete the (CVA) Proving Test within 5WDs after the EFD of the new Metering System.

When a MOA makes changes or additions to an existing Metering System not all the activities performed on the existing Metering System will require a full Proving Test. The CDCA and the



Central Meter Registration Service (CMRS)

The service for registration of data relating to CVA Metering Systems maintained (for the purposes of the Code) by the CDCA.



Supplier Meter Registration Service (SMRS)

The service provided or to be provided by a Licensed Distribution System Operator for the registration of Metering Systems at Boundary Points on its Distribution System(s) and its Associated Distribution System(s) (if any), in accordance with the Master Registration Agreement.

¹ Metering Equipment means Meters, measurement transformers (voltage, current or combination units), metering protection equipment including alarms, circuitry, associated Communications Equipment and Outstations and wiring.

² An Outstation is an item of Metering Equipment which receives and stores data from a Meter(s). The CDCA interrogates the Outstation to transfer the stored metered data to its instation (i.e. data collection system). The Outstation(s) may be one or more separate units or may be integral with the Meter(s).

MOA can therefore perform other agreed checks subject to the MOA (where necessary) performing a risk assessment and the CDCA agreeing to it.

What is the issue?

The BSC Auditor identified a lack of clarity in certain areas of BSCP02:

- Amongst some MOAs identifying when a Proving Tests must be completed and when relevant documentation is to be submitted (i.e. forms BSCP02/4.2 (a) & (b) 'Metering System Commissioning Record' and BSCP02/4.3 'Metering System Proving Test Record').
- BSCP02 Sections 3.1.6, 3.2.6, 3.3.4, 3.4.6, 3.6.6 and 3.7.5³ require the MOA to send a BSCP02/4.3 'Metering System Proving Test Record' to the CDCA within 1WD of completion of the Proving Test. A similar requirement applies to sending Commissioning forms after Commissioning tests are completed (BSCP02 Sections 3.1.3, 3.2.3, 3.4.3, 3.5.1 and 3.6.3⁴). The Auditor suggested that deadlines to submit documentation may not be viable in certain circumstance (e.g. where MOAs have no internet access when working at remote sites).
- Forms provided in BSCP02 may not always be compatible with the newest type of CVA Meters (i.e. Meters with integral Outstations).

³ The BSC Auditor identified the following sections in its market issue document in relation to proving test documents: 3.2.6, 3.3.5, 3.4.6 and 3.6.6. ELEXON confirmed with the BSC Auditor that this list is slightly incorrect and incomplete and the relevant sections are: 3.1.6, 3.2.6, 3.3.4, 3.4.6, 3.6.6 and 3.7.5.

⁴ The BSC Auditor identified the following sections in its market issue document in relation to Commission documents: 3.2.2, 3.4.2 and 3.6.2. ELEXON confirmed with the BSC Auditor that the relevant sections are: 3.1.3, 3.2.3, 3.4.3, and 3.6.3. In addition, ELEXON has identified that Section 3.5.1 and 3.6.1 is inconsistent with these sections as the MOA is required to fill in the Commissioning documents but not send them to the CDCA.

Proposed solution

ELEXON proposes to address the issues by amending BSCP02.

- Clarify the requirements around when Proving Tests have to be completed and documentation submitted (BSCP02/4.2 (a) & (b) 'Metering System Commissioning Test Record' and BSCP02/4.3 'Metering System Proving Test Record').
- Change BSCP02 Section 1.2 (d) 'Objectives' to state that the Proving Test form (BSCP02/4.3) must be submitted in all scenarios where required in Sections 3.1, 3.2, 3.3, 3.4, 3.6 and 3.7.
- Change Section 3.5 'Proving Test Requirements where an Outstation has been replaced by the same Type' and Section 3.6 'Proving Test Requirements where an Outstation has been replaced by a different Type' so that the Commissioning forms (BSCP02/4.2 (a) & (b)) completed for Section 3.5.1 and 3.6.1 are sent to the CDCA by the MOA. This is not currently stated and is inconsistent with other scenarios, for example Section 3.4 'Proving Test Requirements where a Meter has been Replaced with a Different Meter', where the MOA is required to submit the forms to the CDCA.
- Change Section 3.7 'Proving Test Requirements where an Outstation has been Reprogrammed' so that BSCP02/4.2 (a) & (b) forms are required to be submitted to the CDCA for consistency with other scenarios for example Section 3.4.
- Change Section 3.5 so that BSCP02/4.4 'Confirmation of Installation of Metering Equipment' is sent to the CDCA by the MOA at the same time as the BSCP02/4.2 (a) & (b) forms as this is missing.
- Change the timescales for returning the Proving Test document to the CDCA in Sections 3.1.6, 3.2.6, 3.3.4, 3.4.6, 3.6.6 and 3.7.6 from 1WD to 3WD and change the timescales for returning the Commissioning documents to the CDCA in Sections 3.1.3, 3.2.3, 3.3.1 (additional necessary changes will make this 3.3.3), 3.4.3 and 3.6.3 to before or within 3WD of the Proving Test.
- Change Section 3.5, as Section 3.5.1 requires the Commissioning document to be completed but not sent to the CDCA. For consistency, Commissioning documents should be sent to the CDCA within 3WD of an Outstation of a similar type being replaced (a new step 3.5.3 is proposed).
- Change Section 3.7 that currently does not require Commissioning documents to be completed or sent to the CDCA. For consistency, Commissioning documents should be required to be completed and sent to the CDCA within 3WD of an Outstation being reprogrammed (a new step 3.7.2 is proposed for filling the form in).
- Modify the forms BSCP02/4.2 (a) & (b) and BSCP02/4.3 to accommodate Meters with integral Outstations.

These changes will not impact the ability for the CDCA to perform its functions and will not impact Settlement. However, these changes address the Auditor's concern surrounding the time requirements to send relevant documentation as detailed in BSCP02.

ISG195/07

CP1491

CP Progression Paper

19 June 2017

Version 1.0

Page 4 of 10

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Housekeeping Changes

In addition to the changes detailed above we propose to make three Housekeeping Changes as part of this CP:

- BSCP02 Section 2.2 'List of Definitions' defines the term calibration and contains additional details about where initial Meter calibrations may take place. This additional detail is not relevant to BSCP02 as [Code of Practice 4: The Calibration, Testing and Commissioning Requirements of Metering Equipment for Settlement Purposes](#) already covers the specific requirements for calibrating Meters (which changed in November 2008 when [CP1224 'The Review of Code of Practice 4'](#) was approved). We propose to delete these superfluous details.
- In Section 3.2 'Proving Test Requirements for Extension to Existing Installation' there is a reference step number missing after 3.2.6. We will add reference step number 3.2.7 to the step following 3.2.6.
- In Section 5 'Table of Testing Requirements and Methods of Assurance of Settlement Data' the notes section of Ref 21 'VT/CT multicore changes' refers to (Ref) '15' if the Current Transformer/Voltage Transformer (CT/VT) burden changes when changes are made to the CT/VT multicore cables. This is an incorrect reference number and should be to Ref 8 'Reprogramming Meter'. We propose to replace '15' with 'Ref 8'.

Proposer's rationale

The BSC Auditor identified issues faced by MOAs in relation to BSCP02. ELEXON has accepted the findings and agree that a solution needs to be found to resolve the issue. The proposed solutions will clarify which scenarios require the MOA to submit Proving Tests and Commissioning documents to the CDCA.

This CP will also facilitate the timely submission of Commissioning and Proving Test documentation, without impacting Settlement. This is because the CDCA will be able to process the Proving Test documents 3WD after the Proving Test has been conducted without affecting Settlement. In addition the CDCA does not use the information contained in the commissioning documents in its processes. This CP will also provide suitable forms for MOAs to use where Meters with integral Outstations are fitted.

We have also included three Housekeeping Changes in this CP to address some minor errors. Including these Housekeeping Changes in this CP is more efficient than progressing a separate CP.

Proposed redlining

Attachment B contains the proposed changes to BSCP02 to deliver CP1491.

ISG195/07

CP1491
CP Progression Paper

19 June 2017

Version 1.0

Page 5 of 10

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3 Impacts and Costs

There are no Central System Impacts that have been identified to implement the solution proposed by CP1491. However, the CDCA may be required to update its documentation from the CP1491 solution so that it is clear that the CDCA will be expecting the Metering System Proving Test Record documentation from the CVA MOAs.

The implementation costs to deliver CP1491 relate to one Working Day of implementation effort to deliver the document only change, costed at £240.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none">BSCP02	<ul style="list-style-type: none">N/A
<ul style="list-style-type: none">CDCA documentation - Update the documentation to expect from CVA MOA.	

BSC Party & Party Agent impacts and costs

We expect there to be impacts on CVA MOAs as a result of the solution that CP1491 will deliver. Currently we expect process only changes (no system changes) on CVA MOAs. We seek confirmation of the impact on BSC Parties and Party Agents via the CP1491 consultation.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
CVA MOA	Impacts on the timeliness of Proving Tests and required documents to be sent.

4 Implementation Approach

Recommended Implementation Date

We propose that CP1491 is implemented on 22 February 2018 as part of the February 2018 BSC Release. This is the next available Release that this CP can be included in.

5 Proposed Progression

Progression timetable

The table below outlines the proposed progression plan for CP1491:

Progression Timetable	
Event	Date
CP Progression Paper presented to ISG for information	27 June 2017
CP Consultation	10 July 2017 – 04 Aug 2017
CP Assessment Report presented to ISG for decision	22 Aug 2017
Proposed Implementation Date	22 February 18 (Feb 18 Release)

CP Consultation questions

We intend to ask the standard CP Consultation questions for CP1491. We do not believe any additional questions need to be asked for this CP.

The table below notes the standard CP Consultation questions that we propose to ask on the CP1491:

Standard CP Consultation Questions
Do you agree with the CP1491 proposed solution?
Do you agree that the draft redlining delivers the CP1491 proposed solution?
Will CP1491 impact your organisation?
Will your organisation incur any costs in implementing CP1491?
Do you agree with the proposed implementation approach for CP1491?

6 Recommendations

We invite you to:

- **NOTE** that CP1491 has been raised;
- **NOTE** the proposed progression timetable for CP1491; and
- **PROVIDE** any comments or additional questions for inclusion in the CP Consultation.

Appendix 1: Glossary & References

Acronyms

Acronyms	
Acronym	Definition
BSC	Balancing and Settlement Code
BSCCo	Balancing and Settlement Code Company
BSCP	Balancing and Settlement Code Procedure
CDCA	Central Data Collection Agent
CMRS	Central Meter Registration Service
CP	Change Proposal
CPC	Change Proposal Circular
CT/VT	Current Transformer/Voltage Transformer
CVA	Central Volume Allocation
EFD	Effective From Date
ISG	Imbalance Settlement Group
MOA	Meter Operator Agent
MTDs	Meter Technical Details
SMRS	Supplier Meter Registration Service
SVA	Supplier Volume Allocation
WD	Working Day

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 – Summary of Market Issues	https://www.elexon.co.uk/wp-content/uploads/2016/12/BSC-Auditors-Summary-of-Market-Issues-2015-16.pdf
2	BSCP02	https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/
2, 5	Codes of Practice	https://www.elexon.co.uk/bsc-related-documents/related-documents/codes-of-practice/
5	CP1224	https://www.elexon.co.uk/change-proposal/cp1224-the-review-of-code-of-practice-4/

ISG195/07

CP1491
CP Progression Paper

19 June 2017

Version 1.0

Page 10 of 10

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