

Prepared by: P230 Modification Group

ASSESSMENT REPORT for Modification Proposal P230 'Enabling Interoperability through the use of CoP10 and CoP5 Metering'

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Proposed Modification P230 seeks to mandate the use of relevant Codes Of Practice in those circumstances where Suppliers are obliged to use advanced metering by the Electricity Supply Licence. This will ensure consistency of metering requirements and mitigate issues surrounding interoperability of advanced meters in the market.

MODIFICATION GROUP'S RECOMMENDATIONS

The P230 Modification Group invites the Panel to:

- **AGREE** a provisional recommendation that P230 Proposed Modifications **should** be made;
- **AGREE** a provisional Implementation Date for the Proposed Modification of:
 - **25 June 2009 if an Authority decision is reached on or before 24 June 2009**
 - or**
 - **1 working Day after an Authority decision, if decision is reached after 24 June 2009.**
- **AGREE** the draft legal text for Proposed Modifications;
- **AGREE** that Modification Proposal P230 should be submitted to the Report Phase, with a draft Modification Report being submitted for consideration at the Panel meeting on 12th March 2009.

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1 HIGH LEVEL SUMMARY OF ASSESSMENT REPORT

Summary of Proposal
<p>Objective of P230: P230 aims to reduce interoperability issues arising from the introduction of Advanced Metering within the United Kingdom.</p> <p>Proposed Solution: P230 proposes to introduce a requirement within the Code that will mandate the use of relevant Codes of Practise (CoP10 or CoP5 at a minimum) when installing advanced meters as required by the Supply License.</p> <p>Assessment Approach:</p> <ul style="list-style-type: none"> • Use a Modification Group meeting to develop a solution to the issues described in P230; • Issue an impact assessment/consultation to identify the P230 implementation costs, lead times and views from the industry; • Provide a report to the Panel on the findings of the Modification Group as to whether P230 better facilitates the achievement of Applicable BSC Objectives; and • Put finalised obligations in the Balancing and Settlement Code (BSC) and Codes of Practise (CoPs) subject to P230 being recommended by the Modification Group and Panel, and approved by the Authority.

Impacts
<p>Industry:</p> <ul style="list-style-type: none"> • Suppliers • Party Agents <p>Documentation:</p> <ul style="list-style-type: none"> • Sections L of the BSC; and • CoP's <p>Please refer to the IWA for additional comments: P230 IWA</p>

Implementation Costs
<p>The estimated ELEXON implementation cost is 2 man days, which equates to £440.</p>

Benefits and Drawbacks under Applicable BSC Objectives (c) and (d)	
<p>Benefits:</p> <ul style="list-style-type: none"> • Affords Parties the opportunity of moving between the Non Half Hourly and Half Hourly segment of the market; • Improves consumer access to, and transparency of, the market allowing customers to switch Suppliers more easily; • Will improve accuracy of data flowing into Settlement; • Reduce the issues associated with interoperability. 	<p>Drawbacks:</p> <ul style="list-style-type: none"> • None identified

Implementation approach

The Modification Group recommends the following Implementation Dates:

- **30 June 2009** if Authority decision is reached on or before 24 June 2009; or
- **1 Working Day after an Authority decision**, if decision is reached after 24 June 2009.

Summary of Consultation/Impact Assessment Responses Received

Question	Yes	No
Do you believe P230 would better facilitate the achievement of the Applicable BSC Objectives?	8	0
Do you believe that the legal text developed by the Group delivers the intended solution for P230?	8	0
Would P230 impact your Organisation?	4	1

Modification Group's Recommendation

Within the Modification Group there is a:

- **Unanimous** view that the Proposed Modification is better than the current arrangements;

The Group's unanimous recommendation is that **P230 Proposed Modification SHOULD be made.**

2 BACKGROUND

The introduction of advance metering into the United Kingdom has highlighted concerns regarding interoperability¹ of metering in the market. These concerns need to be addressed to maintain consistency of advanced metering within the market. The proposed amendments to the Electricity Supply Licence has raised the necessity for addressing these interoperability issues sooner rather than later.

2.1 Proposed Changes to the Electricity Supply Licence

The Electricity Supply Licence sets out the requirements for parties who wish to partake in the supply of electricity within the UK. Proposed amendments to the standard conditions of the Electricity Supply Licence have been proposed by Ofgem, along with a similar provision for the Gas Supply Licence.

The proposed amendments to the Electricity Supply Licence read as follows:

"Advanced meters for Non-Domestic Premises [electricity]

12.17 This paragraph has effect on and after 6 April 2009 and applies where the licensee installs or arranges for the installation of an Electricity Meter at Non-Domestic Premises where the metering point falls within profile class 5, 6, 7 or 8 as defined in the Balancing and Settlement Code (for this condition only, "relevant premises").

12.18 If paragraph 12.17 applies, the Electricity Meter installed at the relevant premises must be an advanced meter.

12.19 For the purposes of this condition, an advanced meter is an Electricity Meter that, either on its own or with an ancillary device, and in compliance with the requirements of any relevant Industry Code, is able:

- (a) to provide measured electricity consumption data for multiple time periods, and at least half-hourly; and*
- (b) to provide the licensee with remote access to such data.*

12.20 The licensee must ensure that a Customer supplied with electricity at relevant premises through an advanced meter, or that Customer's nominated agent, is able to have timely access, on request, to the data provided by that meter.

12.21 As from 6 April 2014, the licensee must not supply electricity to any relevant premises other than through an advanced meter.

12.22 The prohibition imposed by paragraph 12.21 does not apply where the licensee is unable to install or arrange for the installation of an advanced meter at the relevant premises in question despite taking all reasonable steps to do so."

2.2 The Issue

Following the announcement of the potential amendments to the Supply Licence an expert group (Advanced Metering Interoperability Review Group) was set up. The expert group were to determine an approach that would enable Suppliers to demonstrate compliance with the proposed amendments to the Electricity Supply Licence condition. The group also sought to establish a consistent approach to metering in the UK market by addressing the issues of interoperability for Profile Classes 5 to 8.

The group concluded that the requirements set out in paragraphs 12.17 and 12.18 of the proposed amendment to the Electricity Supply Licence should be met by installing CoP10 or CoP5 compliant meters

¹ "Interoperability" defined in terms of the goal in Section 3.1 of the Advanced Metering Operational Framework: Profile Classes 5 to 8: [Advanced Metering Operational Framework](#)

into premises affected by the licence change. These meters would be capable of providing Half Hourly interval data, even though Metering Systems would continue to be settled under the Non Half Hourly arrangements, unless the Supplier chooses otherwise.

Furthermore, the group noted that the Electricity Supply licence does not prescribe which types of advanced metering shall be used. The type of metering installed is therefore dependent on Suppliers' interpretation of the licence condition. This leaves a risk of interoperability issues as different Suppliers could install different types of meters as they believe it to meet the licence condition.

3 P230 SOLUTION

Modification Proposal P230 has been raised to mandate the use of relevant Codes of Practice in those circumstances where Suppliers are obliged to use advanced metering by the Electricity Supply Licence. This will ensure consistency of metering requirements and mitigate issues surrounding interoperability of advanced meters in the market.

It should be noted that advanced metering technology is being introduced into the market independently of the proposed changes to the Electricity Supply Licence.

For a full description of the original Modification Proposal as submitted by the Proposer, please refer to the following link: [P230 Background Documentation](#).

3.1.1 Balancing and Settlement Code Changes

Legal text has been drafted in a manner that will ensure the flexibility and robustness that is required to effectively implement this Modification. The Supply License states that any new Metering Equipment that is installed at Non-Domestic Premises within Profile Classes 5 – 8 (PC5-8) from the 6 April 2009 will need to be an 'advanced meter'. The legal text for P230 ensures that BSC Parties comply with relevant Codes of Practice (CoP's) when installing 'Advanced Meters' pursuant to the conditions set out within the Supply License.

In addition the legal text will ensure that when an 'advanced meter' (as described by the Supply License) is installed or replaced (Post 6 April 2009), it is replaced by Metering Equipment that is compliant with the latest version of the applicable CoP at the date at which such Metering Equipment is installed. This will ensure that the version of the CoP that the Registrant complies with will be compliant with the Supply License and P230.

It is important to note that although the proposed changes to the Standard Conditions of the Electricity Supply Licence refers specifically to PC5-8; the drafted legal text will neither preclude nor mandate the solution from being relevant to other areas of the market.

The rationale for this is that, if changes are made to the Supply License in the future, in respect of 'advanced metering', (for example necessitating the use of advanced metering in other profile classes) this could be dealt with by amending the CoPs with a Change Proposal rather than raising a Modification to amend the BSC. To support this efficiency and flexibility the relevant CoPs will be updated (see the section below).

The draft legal text can be found in Attachment 1.

3.1.2 Codes of Practice

P230 will necessitate a change to the CoPs in order to ensure that BSC Parties are clear on which CoPs are the relevant CoPs. The Group considered potential wording within to be included within CoPs 1-3, CoPs 5-7 and CoP10².

In addition the Group believed that additional wording would need to be drafted within CoPs 8 and 9 in order to ensure that these CoPs are not applicable in respect of PC5-8.

The wording to be included within the relevant CoPs will be presented within the Final Modification Consultation.

² Please refer to section 5.1 for links to the relevant CoPs

4 INITIAL GROUP DISCUSSIONS

The P230 Modification Group 'the Group' met on 20 January 09. The sections below outline the **initial** principles that the Modification Group discussed and considered while developing the proposed legal text. For the Groups conclusions (incorporating the views expressed by industry during the consultation and impact assessment) please refer to section 6.

4.1 Measurements Instruments Directive

The Measuring Instrument Directive (MID) came into force in March 2004 and was enacted into UK Legislation (via The Measuring Instruments (Active Electrical Energy Meters) Regulations 2006 (SI 2006 No. 1679)).

The MID is concerned with devices for legal measurements such as, electricity and gas Meters, and its primary aim is to create a single market for measuring instruments across EU countries i.e. Meters can be put on the market and used in any EU country irrespective of where in the EU the MID approval was given. The MID establishes requirements which all Meters for use at premises below 100kW must comply with.

The European Commission has indicated that National metering requirements that Member States have in place, or intend to introduce, may be in contravention of the MID. They are eager that Member States do not introduce requirements that are above the standards set out in the MID, as this has the potential to frustrate the intention of the MID i.e. to create a single market for the use of Meters across the EU.

Accordingly this may impact on metering requirements set out in the BSC and its subsidiary documents including those relevant to advanced metering. The National Weights and Measures Laboratory (the government body responsible for legal metrology) are currently in discussion with the European Union in respect of these issues.

Previous discussions between the Proposer, Ofgem, ELEXON and the Department of Energy and Climate Change 'DECC' have highlighted this issue. It was felt that, whilst this is an important issue that the Modification Group should be aware of, the Group are not in a position to resolve any potential conflict between the BSC/Code Subsidiary Documents and the MID. Ofgem, DECC and the National Weights and Measures Laboratory are currently in discussions with the European Commission to come to an agreement on these concerns.

The Panel and Ofgem supported the approach that the Modification Group should consider and not resolve any potential conflicts between the MID, BSC and P230.

The Modification Group noted the background to the MID and any issues that might arise from its intention to create a single market for the use of Meters across the EU. The Group believed that the MID was not particularly clear and that it was open to a lot of interpretation. This lack of clarity meant that any decisions by a member state to mandate requirements would be reliant on legal interpretations of any definitions used. A group member noted that whilst there may be some concerns about a Member State mandating minimum metering requirements, there may not be a problem with individual companies using requirements above the minimum.

In conclusion the Group agreed that whilst this was an important issue to consider it was not something that the Group could resolve. And it was believed that such matters should be addressed by Ofgem, DECC and National Weights and Measures Laboratory to consider.

4.2 Initial Implementation Timescales

The proposed effective date for the proposed Supply Licence amendments is the 6 April 2009. However, affected parties will have until the 6 April 2014 to comply with these changes. The P230 Modification Group took this into consideration while deciding on implementation dates.

The Group considered two main approaches. To implement P230 in line with the amended Supply Licence (6 April 09); or wait 6/7 months and implement in November 09.

In their initial discussion the Group believed that the later implementation date of November 09 would not be appropriate. The Supply Licence obligations would 'go live' on 6 April 09 leaving the issues of interoperability unresolved adding to potential confusion in the market. There was also the potential that inappropriate meters could be installed between April and November compounding the interoperability issues further.

In respect of an April 09 implementation date, a Modification Group member raised a concern that CoP10 compliant Metering Equipment might not be available in time for implementation in April 09. The Group discussed the issue and queried how Metering Equipment might be made available in time.

ELEXON explained that:

- If Meter has an existing approval (i.e. CoP5) then ELEXON will use the test results for that approval and evaluate results against CoP10. If successful, ELEXON will issue a certificate of compliance. Expected duration for this option is 5 to 10 working days.
- If Meter is not already approved then the Manufacturer should send the meter to testing agent, test and provide a report to ELEXON. If testing is successful then ELEXON will issue a certificate of compliance. This option typically takes 1 to 2 months to complete.
- If compliance is unsuccessful then the Manufacturer can either modify the meter and re-test; or seek a BSC Party to raise a metering dispensation. Meter modifications may take between 3 to 6 months to resolve whereas the dispensation process is usually completed within 2 months.

The Group noted the above explanation and agreed that an implementation date of 6 April 09 would be more appropriate. It was felt that this implementation date would provide earlier guidance to participants on what meters to install and would send the correct signals to Suppliers/Manufacturers to prepare for the changes to the Supply License. The Group consulted on this initial implementation date (see section 6 for conclusions).

4.3 P230 Benefit Analysis

The Group discussed the benefits and drawbacks of P230. It was acknowledged that P230 is fundamentally about improving interoperability and facilitating Suppliers compliance with the amended Supply license. The group considered these fundamental benefits and believed that it would be difficult to quantify the impact of increased consistency and Industry confidence.

Regarding the Environmental impacts, DECC has championed the introduction of Advanced Metering in an attempt to address issues associated with climate change and energy consumption. It is not anticipated that there will be any additional environmental impacts over and above those addressed by DECC, with this in mind, the P230 Group will not be focusing on environmental impacts.

5 WHAT DID INDUSTRY THINK?

The P230 Group's initial views were issued for an industry impact assessment and consultation on the 21 January 09. The sections below highlight the opinions expressed by respondents:

5.1 Consultation Responses

Eight responses were received which are summarised below. For further details please see Appendix 6:

- **Does P230 better facilitate the Applicable BSC Objectives?**

Respondents unanimously agreed with the Modification Groups view that P230 does better facilitate the applicable BSC Objective. No new comments were received.

- **Does the P230 legal text deliver the intended solution?**

Respondents unanimously believed that the P230 legal text delivered the intended solution. However, a respondent expressed a concern that the legal text was drafted in a manner that would not easily be understood by the general reader.

- **Does the proposed wording to be included within the relevant CoPs deliver the intended solution?**

The majority of respondents believed that the proposed wording would be appropriate for addressing the P230 solution. One respondent felt that the text may need to be redrafted to reflect any updates to the legal text.

- **Are there any quantifiable benefits associated with P230?**

The majority of respondents agreed with the Group that there were no clear quantifiable benefits associated with P230. Some respondents believed that the quantifiable benefits of P230 would only be realised upon implementation and that the primary aim of P230 was to facilitate consistency within the market and ensure that suppliers are compliant with their licence obligations.

- **Do you agree with the Implementation Dates Proposed by the Group?**

Respondents unanimously agreed with the implementation dates proposed by the Group.

5.2 Impact Assessment Responses

Five responses were received which are summarised below. For further details please see Appendix 7:

- **How will P230 impact your organisation?**

The majority of respondents did not believe that P230 would have a major impact on their organisation. A respondent noted that their organisation already had measures in place in order to address issues arising from P230. In addition the respondent believed that P230 would reduce costs, facilitate Interoperability, reduce the risk of stranded assets and minimise the issues arising with the change of Supplier/Agent.

- **Concerns raised**

Two respondents commented on the proposed implementation dates. One respondent raised a concern that there may not be any CoP10 compliant Meters available in April 09. And that by extending the Implementation dates BSC Parties will be afforded enough time to seek approval for CoP5 and CoP10 Meters.

Another respondent believed that the implementation date will not have an adverse impact and will in fact minimise cost by ensuring that only CoP5/10 meters are used, reducing risks of stranded assets and helping the Change of Supply/agents process.

6 WHAT ARE THE GROUP CONCLUSIONS?

After receiving the impact assessment and consultation responses, the P230 Group met to consider the views and opinions of participants and re-evaluate their initial recommendations. The conclusion of the Group is detailed below.

6.1 Measurements Instruments Directive

The Group reaffirmed their initial view that whilst MID compliance was an issue it was not something that could be resolved by the Group. (Please refer to section 4.1 for further detail).

6.2 Implementation Dates

The Group noted concerns expressed by respondents that Metering Equipment compliant with CoP10 may not be available in time for implementation in April 09 and that Manufactures would have stocks of non-compliant meters. The Group had previously considered this matter and had decided that, to reduce inoperability issues and to send correct signals to Suppliers/Manufactures, an Implementation date of April 09 should be set (see section 4.2).

The Group however reconsidered their approach. In order to provide BSC parties with enough time to obtain the compliance required the Group proposed the following implementation dates:

- **25 June 2009** if Authority decision is reached on or before 24 June 2009; or
- **1 Working Day after an Authority decision**, if decision is reached after 24 June 2009.

The Group noted that this would align with the BSC systems Release in June 09 (25 June 2009).

The Group believed that the 3 months provided by the new implementation dates would allow Suppliers/Manufactures sufficient time to meet the proposed BSC obligations. The Group were extremely keen that the signals being sent to Suppliers and Manufactures were not lost. It is important that Suppliers/Manufactures do not wait until 25 June 2009 before preparing to be BSC compliant, and that the extended implementation dates are there to assist, not stall, the process of being CoP10 compliant.

In addition the Group suggested that ELEXON and Ofgem notify BSC Parties of the implications of P230 and stress the importance of obtaining CoP10 compliance well in advance of the P230 implementation dates.

Some Group members raised concerns that during the 3 months prior to implementation, Parties would be able to install non-compliant Meters which would increase the issues surrounding interoperability within the market. The Group acknowledged that this was a concern, but believed that the number of meters installed in the 3 month period would be relatively small. It was also felt impractical to place obligation on participants to use CoP10 meters when few would be available by 6 April 09.

A concern was also raised that Suppliers would have to replace any non-compliant meters during the 3 month period (after 6 April and before 25 June) if there was a Change of Supplier and/or Change of Agent, in order for the Suppliers to meet the Supply License condition.

A Group member noted that Parties could install CoP5 Meters in the interim in order to reduce the risk of interoperability and to negate meter replacement on Change of Supplier and/or Change of Agent. The Group agreed that CoP5 Meters may be more expensive, but that individual Parties would have to recognise the commercial risks.

Based upon the above rationale the Group unanimously agreed that the implementation dates of **25 June 2009** (if Authority decision is reached on or before 24 June 2009) or **1 Working Day after an Authority decision** (if decision is reached after 24 June 2009) would provide parties with a reasonable time frame in which to prepare for the Code changes and was thus a fair compromise.

6.3 Supply Licence Changes

During the Impact Assessment/Consultation it was queried by a respondent what would happen if the Supply License amendments were rejected or if the proposed amendments were changed during the process. The Group considered the impact of the proposed Supply Licence amendments being changed or not be approved.

The Group believed that P230 had been raised with the fundamental assumption that the Supply Licence would be approved and that the intention was to present the Panel and the Authority with a solution for when the Supply License change occurred. If the Supply License were to change or be rejected the Group were aware that the Authority could reject P230. However, this would be at the discretion of the Authority who would decide whether or not to approve P230 in relation to the Supply Licence and any changes that it might undertake. The Proposer of P230 supported the Group's view.

In addition the Group noted that the BSC Panel and Ofgem would have a better understanding of the above issues by March, when the Panel would be presented with the Final Modification Report.

6.4 Disadvantages of not Implementing P230

A Group member noted that although there had been numerous responses received regarding the benefits of P230, there had been no comments received relating to the disadvantages of not implementing P230. The Group member believed that if P230 was not approved there would be a legacy of interoperability issues within the market. The Group member believed that it would be preferable to address this now rather than facing these issues in the future.

7 ASSESSMENT AGAINST THE APPLICABLE BSC OBJECTIVES

7.1 Summary of Groups Views

The unanimous view of the Group is that that the Proposed Modification improves on the current baseline and that P230 better facilitates:

BSC Objective (C) & (D)

The rationale for the Modification Groups views are highlighted in the tables below:

BSC Objective (c): Promoting effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity	
For	Against
<ul style="list-style-type: none"> Affords Parties the opportunity of moving between the Non Half Hourly and Half Hourly segment of the market; Improves consumer access to, and transparency of, the market allowing customers to switch Suppliers more easily; Reduce the issues associated with interoperability. 	<ul style="list-style-type: none"> None identified

BSC Objective (D): Promoting efficiency in the implementation and administration of the balancing and settlement arrangements	
For	Against
<ul style="list-style-type: none"> Will improve accuracy of data flowing into Settlement 	<ul style="list-style-type: none"> None identified

In Conclusion:

Within the Modification Group there is a:

- Unanimous** view that the Proposed Modification is better than the current arrangements;

The Group's unanimous recommendation is that **Modification Proposal P230 Modification SHOULD be made.**

8 TERMS USED IN THIS DOCUMENT

Other acronyms and defined terms take the meanings defined in Section X of the Code.

Acronym/Term	Definition
DECC	Department of Energy and Climate Change
MID	Measurements Instruments Directive

8.1 References

Ref.	Document Title	Owner	Issue Date	Version
1	P230 Modification Proposal	N/A	23/12/08	1.0
2	Advanced Metering Operational Framework	ELEXON	24/10/08	1.0
3	ELEXON - Codes of Practice	ELEXON	N/A	N/A

APPENDIX 1: APPLICABLE BSC OBJECTIVES

For reference the Applicable BSC Objectives, as contained in the Transmission Licence, are:

- (a) The efficient discharge by the licensee [i.e. the Transmission Company] of the obligations imposed upon it by this licence [i.e. the Transmission Licence];
- (b) The efficient, economic and co-ordinated operation of the GB transmission system;
- (c) Promoting effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity;
- (d) Promoting efficiency in the implementation and administration of the balancing and settlement arrangements.

APPENDIX 2: PROCESSES FOLLOWED

Copies of all documents referred to in the table below can be found on the BSC Website at:

[P230 Background Documentation](#)

Date	Event
23/12/08	Modification Proposal raised by Scottish and Southern Energy
15/01/09	IWA presented to the Panel
20/01/09	First Assessment Procedure Modification Group meeting held
21/01/09	P230 Consultation and Impact Assessment Issued
02/02/09	P230 Consultation and Impact Assessment responses received
05/02/09	Second Assessment Procedure Modification Group meeting held

APPENDIX 3: ESTIMATED COSTS

ESTIMATED COSTS OF PROGRESSING MODIFICATION PROPOSAL	
Meeting Cost	£1000
Legal/Expert Cost	£0
Impact Assessment Cost	£0
ELEXON Resource	24 man days £6,000

APPENDIX 4: MODIFICATION GROUP MEMBERSHIP

Member	Organisation	20/01/09	TBD
Adam Lattimore	ELEXON (Chairman)	√	√
Stuart Holmes	ELEXON (Lead Analyst)	√	√
Martin Brandt	Scottish and southern Energy (Proposer)	√	X
Rosie McGlynn	EDF Energy	√	X
Glenn Sheern	E.ON UK	X	X
James Evans	British Energy	√	√
Ken Ruickbie	Scottish Power	√	X
Louisa Stuart-Smith	npower	√	X
Bryan Donnelly	SAIC	√	√
Eric Graham	TMA	X	X
John Sykes	Scottish and southern Energy (Proposer's Representative)	X	√
Attendee	Organisation		
Helen Boothman	ELEXON	√	√
Sarah Mann	ELEXON (Lawyer)	√	√
Nigel Nash	Ofgem	√	√
Steve Francis	ELEXON (Design Authority)	√	X
Beverley Adams	BEMA	√	X
Graeme Wood	-	√	X
Tom Chevalier	Association of Meter Operators	X	√

APPENDIX 5: MODIFICATION GROUP TERMS OF REFERENCE

Modification Proposal P230 will be considered by the P230 Modification Group, formed from the Volume Allocation Standing Modification group, in accordance with the VASMG Terms of Reference and the Appendix attached.

P230 – Enabling Interoperability through the use of CoP10 and CoP5 Metering

ASSESSMENT PROCEDURE:

- 1.1 The Modification Group will carry out an Assessment Procedure in respect of Modification Proposal P230 pursuant to section F2.6 of the Balancing and Settlement Code.
- 1.2 The Modification Group will produce an Assessment Report for consideration at the BSC Panel Meeting on 12 February 2009.
- 1.3 The Modification Group shall consider and/or include in the Assessment Report as appropriate:
 - The Group shall note the current events occurring in relation to the MID and ensure that DECC and Ofgem are involved during the assessment of P230. Please note that the Group shall not be asked to resolve this issue.
 - Consider the flexibility and robustness of legal text. The Group shall ensure that legal text is drafted in a manner that:
 - I. Does not constrain parties from using other relevant CoP's; and
 - II. Is flexible enough to accommodate any future changes to the Supply License without the need to raise further Modifications.
 - Consider any Alternative Modifications.

It is suggested that the P230 Modification Group consider recommendations highlighted during the Advanced Metering Interoperability Review.

The Department of Energy and Climate Change (DECC) has championed the introduction of Advanced Metering in an attempt to address issues associated with climate change and energy consumption. It is not anticipated that there will be any additional environmental impacts over and above those addressed by DECC, with this in mind, the P230 Group will not be focusing on environmental impacts.

APPENDIX 6: DRAFT LEGAL TEXT

Draft legal text can be found in Attachments 1.

APPENDIX 7: IMPACT ASSESSMENT RESPONSES

Full Impact Assessment responses can be found in Attachment 2.

APPENDIX 8: CONSULTATION RESPONSES

Full Impact Assessment responses can be found in Attachment 3.