

CPC00652 – Impact Assessment Responses for DCP230

DCP230 - Enabling Interoperability through the use of CoP10 and CoP5 Metering

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement Yes/No	Days Required to Implement
Association of Meter Operators	Trade Association for Meter Operator	--	6 months
Npower	Supplier, Party Agent	Yes	None
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd; SSE Metering Ltd	Supplier/Generator/ Trader / Party Agent / Distributor	--	Not mentioned
E.ON UK Energy Services Limited	MOA NHHDC/DA	--	Not mentioned
SAIC Ltd on behalf of ScottishPower	--	--	Ready for 6 th April

Detailed Impact Assessment Responses

Organisation	Agreement Yes/No	Comments	Impact Yes/No
<p>Organisation: Association of Meter Operators</p>	<p>--</p>	<p>Question 1 - It will impact on Meter Operators. The comments are based on the latest version of legal text issued by Stuart.</p> <p>Question 2 - The implementation date should be six months beyond the approval date. This would allow metering manufacturers and purchasers to seek approval to CoP5 or CoP10. As of recently no applications for CoP10 approval had been received. Without this delay there could result in no meters being approved for use. There is no assurance that Parties will be granted dispensations, therefore using this as an assumption seems premature. The Supplier Licence has been sent to the EC for consideration. Comments are due back during February. These comments may influence the proposed changes, so the proposal should await any receipt of comments.</p>	<p>Yes</p>

	--	<p>Any further comments - Some participants/customers use metering equipment which do not comply with CoP5 (and may not meet CoP10) but meet the licence requirements. The proposed MOD needs to be considered carefully from the challenge under competition act restriction of trade - manufacturers cannot market install products which meet the licence conditions, but not the ELEXON Metering CoPs. Equally the conflict between the ELEXON Metering CoPs (probably regarded as a National Code) with the MID which is seeking to promote free trade in metering products.</p> <p>It would be curious for BSC parties to propose a change which leaves them exposed to challenge, without appropriate legal consideration.</p> <p>In the document, Issue 2.2 "This leaves a risk of interoperability issues as different types of metering (for example, multi register) could be deemed to meet the licence condition." This is no longer true in the current proposed licence condition which quotes HH data.</p> <p>I am uncertain how the proposed wording works with metering systems trading HH? They are not PC5-8 - often referred to as PC 0. How does it work with a change of PC from PC3-4 to PC5-8? Or vice-versa? Or from PC5-8 to HH and vice-versa?</p>	
Organisation: Npower	Yes	<p>Question 2 - We do not envisage any additional system amendments/costs specifically as a result of P230.</p> <p>We agree with the proposed implementation timescales.</p>	Yes
Organisation: Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd; SSE Metering Ltd;	--	No further comments	No

<p>Organisation: E.ON UK Energy Services Limited</p>	<p>--</p>	<p>Question 2 - No additional costs are likely to be incurred in relation to current activity however future technical solutions will be constrained by the requirements of P230.</p> <p>No further comments</p>	<p>Yes</p>
<p>Organisation: SAIC Ltd on behalf of ScottishPower</p>	<p>--</p>	<p>Question 1 - ScottishPower does not believe there will be a significant impact on its organisation as a result of these proposals. It is prepared for the new obligations and, as such, has put measures in place to meet the new license obligations.</p> <p>Question 2 - As stated above ScottishPower have put in place measures to ensure it is ready for the 6th April go-live date of the new obligations. The implementation date will, therefore, not impact its business. ScottishPower believes the new modification will actually minimise its costs by ensuring that only COP 5 and COP10 compliant meters are used, thus facilitating interoperability, reducing the risk of stranded assets and ameliorating potential issues around the Change of Supplier and Change of Agents processes. Our one concern is stated below in Q3.</p> <p>Any further comments - We are concerned that, as yet there are no meters available which are compliant with COP10. As such we would either have to take a position to install meters which we expect to be approved and apply for metering dispensation in the interim or install the more expensive COP5 meters which though suitable for such sites may have functionality which is unnecessary for particular sites resulting in the cost of meeting the new license obligations being higher than need be. We feel that this current situation should be noted and measures put in place to assist Suppliers during the initial phase of the new obligations.</p>	<p>No</p>