

P283: 'Reinforcing the Commissioning of Metering Equipment Processes'

Consultation issued on 14 June 2013

We received responses from the following Parties

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase

Company	No BSC Parties / Non-Parties Represented	Role of Parties/non-Parties represented
Association of Meter Operators	0/1	Other
British Gas	1/0	Supplier
EDF Energy	10/0	Supplier / Party Agent / Generator / Consolidator / Exemptable Generator / Trader
Electricity North West Limited	1/0	Distributor
National Grid	1/0	Transmission System Operator
RWE npower	9/0	Supplier/Party Agents
ScottishPower Group	7/0	Supplier/Generator/Trader/ Consolidator/Exem0ptable Generator/Distributor
SSE Energy Supply Ltd	1/1	Supplier/Party Agent
SSE Power Distribution	2/0	Distributor (LDSO)
TMA Data Management Ltd	0/1	NHHDC, NHHDA, HHDC and HHDA
UK Power Networks	3/0	LDSO
Western Power Distribution	4/1	Distributor/MOA

Question 1: Do you agree that the draft BSC legal and redlined changes to CoP4 deliver the intention of P283?

Summary

Yes	No	Neutral/Other
10	1	1

Responses

Respondent	Response	Rationale
Association of Meter Operators	Yes	In the drafting the undefined term 'network operator' has been used. The BSC defined term is 'Distribution System Operator'. Throughout the proposed drafting of CoP4, this should be changed.
British Gas	Yes	-
EDF Energy	Yes/No	<p>We have not undertaken formal review of the BSC legal text, but following informal internal review we have no comments on the latest proposed text changes.</p> <p>We have not undertaken formal review of the proposed changes to CoP4, but have the following minor comments on the proposed text changes:</p> <p>Page 7 first bullet typo: "thisCoP4;"</p> <p>4.20 typo "enables" should say "enable".</p> <p>5.31 "of 5.3, are" should say "of 5.3 are".</p> <p>5.31 Suggest use of new paragraph 5.31A to avoid renumbering subsequent paragraphs, to reduce potential need for changes in participant working procedures.</p> <p>5.5 includes new text "For the avoidance of doubt it shall be the responsibility of the relevant MOA to ensure that the Metering System complies with the requirements of the applicable CoPs including the assessment of overall accuracy based on any evidence provided by other Parties in accordance with CoP4." While this clarifies that the relevant MOA is expected to ensure compliance with CoPs, it does not remove the ultimate obligation under the BSC on the registrant to ensure compliance. Suggest "For the avoidance of doubt and notwithstanding the obligation under the BSC for the registrant to ensure compliance, ...". Also, the evidence which may be provided by other Parties might be from equipment owners which are not BSC Parties, so "parties" should not be capitalised.</p>

Respondent	Response	Rationale
Electricity North West Limited	Yes	The red lined changes provide clarity as to who has responsibility for the activities with regards to commissioning and testing of equipment, and the collaboration and maintenance of records.
National Grid	Yes	The proposed text appears to reflect the views and comments on the respondents.
RWE npower	Yes	<p>The current redlining of CoP4 ('SCOPE' section, page 7 - below) appears to indicate that further change may be warranted to allow for an efficient process by which an MOA can report successful or unsuccessful commissioning to a registrant. In all likelihood this is best achieved via a DTC change rather than an underpin process.</p> <p><i>'In the case of Half Hourly Metering Equipment it shall be the responsibility of the MOA to notify its Registrant, via an auditable, electronic method, that either:</i></p> <ul style="list-style-type: none"> <i>• All items of Metering Equipment have been fully and successfully Commissioned in accordance with this CoP4; or that</i> <i>• There are defects or omissions in the completion of the processes set out in this CoP4 which have the potential to affect Settlement. Such notification shall include details of any defects or omissions identified and an assessment of the potential implications for the Registrant, customer and network operator. Where such notification is provided and the Registrant believes that there is a risk to Settlement it shall, in accordance with Section L3.6 of the BSC, consult with the relevant network operator and agree the appropriate steps to be taken to minimise the risks to Settlement. Such agreements shall be recorded and be made available on request to the BSC Panel.'</i> <p>Section 5.3.1 in the CoP4 redline (below) leaves the obligation on the MOA to ensure the operation of CT/VTs where the owner is not a BSC party. A better way of dealing with this scenario might be to place an obligation on the DNO or network provider to obtain the relevant information from the owner before allowing connection to their respective networks. This could then be passed to the MOA (as it would be if the owner was a BSC party).</p> <p>5.3.1 Responsibility for Calibrations and maintenance of Records. <i>Where measurement transformers are owned by a BSC</i></p>

Respondent	Response	Rationale
		<i>Party that Party shall be responsible for ensuring the requirements of 5.3, are performed up to and including the Testing Facilities. In addition that Party shall prepare, and make available to the appointed MOA, complete and accurate calibration records in relation to these obligations. Where measurement transformers are not owned by a BSC Party the Registrant, via its appointed MOA, shall be responsible for these requirements.</i>
ScottishPower Group	Yes	The proposed redlining on the documents appear appropriate.
SSE Energy Supply Ltd	Yes	SSE supports the proposed solution, to help resolve non-compliance issues with respect to Technical Assurance Audits. Agree with page ref: 12.
SSE Power Distribution	Yes	SSEPD supports P283 as the proposed solution better facilitates compliance.
TMA Data Management Ltd	Yes	-
UK Power Networks	Yes	<p>In general we agree with the spirit of the proposal but we do consider it unnecessary for the Equipment Owner to conduct equipment checks where all the relevant equipment is accessible to the HHMOA, for example LV cable servicehead / LV CT chamber CoP5 installations where the HHMOA can freely commissioning the entire metering system themselves free of any operational restrictions. It would seem sub-optimal, considering the familiarity with such testing for activity to be conducted by the licenced distributor at potentially higher cost compared to commissioning on the day of metering installation by the HHMOA. We would suggest that commissioning by the Equipment Owner ought only to be required where the Equipment Owner does not wish to grant access to the HHMOA or practically due to operational reasons access would not otherwise be possible. LV CoP5 cablehead installations constitute the bulk of CT metered installations.</p> <p>We also note at this time that the structured data coding of MPANs has not yet evolved to adequately identify MPANs as relating to Embedded Metering Points within licence exempt distribution systems nor displaced metering positions for which equipment is not owned by a licenced distributor. Further work on the practicalities of and the setting of expectations in respect of distributor/customer equipment used for the purposes of settlements metering will be required, not</p>

Respondent	Response	Rationale
		least to avoid the presumption of ownership of CTs and VTs, small core wiring and Testing Facilities by a licenced distributor in all cases. We would expect the full co-operation of relevant parties through any subsequent BSC or MRA changes necessary to better support P283 following implementation.
Western Power Distribution	No	The consultation report states this modification is not retrospective but this is misleading. Whenever a meter is changed or even where there is a change of MOA there is a requirement to establish the metering system is commissioned. That will lead to the process of the MOA requesting certificates and commissioning records for the DNOs equipment and the consequent discussion between the Supplier and DNO about how to address any gaps in records. This will impact all the HH metering systems whatever vintage the CTs and VTs. This situation could be avoided by amending the redlined changes to make clear that the revised requirements only apply to equipment installed on or after the effective date of the modification.

Question 2: Do you agree with the Panel's recommended Implementation Date?

Summary

Yes	No	Neutral/Other
12	0	0

Responses

Respondent	Response	Rationale
Association of Meter Operators	Yes	-
British Gas	Yes	-
EDF Energy	Yes	Yes, 9 - 12 months' notice following a decision is sufficient time for EDF Energy to implement the proposed changes.
Electricity North West Limited	Yes	The implementation date of 6th November 14 or the next BSC release at least 12 months after the decision is received is adequate for parties to ensure they have the relevant process and procedures in place to comply and for workshops to develop the

Respondent	Response	Rationale
		COP4 Guidance.
National Grid	Yes	Taking implementation lead time into account and then aligning with a BSC Release is a sensible approach to implementation.
RWE npower	Yes	As this will require changes to existing processes, both in the field and office, we are in agreement that 12 months from approval is reasonable.
ScottishPower Group	Yes	ScottishPower believes that P283 should be implemented as soon as possible but recognising its impact on parties, the need for a robust auditable trail and the development of the guidance documents, agrees that 12 months lead time is appropriate.
SSE Energy Supply Ltd	Yes	Agree with page ref: 14
SSE Power Distribution	Yes	-
TMA Data Management Ltd	Yes	12 months lead time provides adequate notice to implement the necessary changes by the impacted parties, from previous responses to P283.
UK Power Networks	Yes	12 months from approval seems reasonable as a minimum, however the Panel should be aware that the fragmented nature of electricity distribution arising from the growth of competitive connections provision by Independent Connections Providers. We would urge the very speedy delivery of formal guidance, if approval of P283 is given, in order that all licenced distributors can commonly vary the requirements they place upon Independent Connections Providers for the conducting of tests and the provision of documents and commissioning records.
Western Power Distribution	Yes	This will provide sufficient time for us to implement the changes.

Question 3: Do you agree with the Panel's initial recommendation that P283 should be approved?

Summary

Yes	No	Neutral/Other
12	0	0

Responses

Respondent	Response	Rationale
Association of Meter Operators	Yes	-
British Gas	Yes	-
EDF Energy	Yes	<p>Increasing the onus for providing accurate commissioning data on the parties that have that information can only improve the commissioning process and reduce incidents of inaccurate meter configuration and resulting meter data inaccuracy.</p> <p>The accuracy of metered data allocated to parties in Settlement would be improved under P283, thus better meeting BSC Objective (c) concerning effective competition.</p> <p>Reduction in the number of errors in meter data would reduce the administrative cost of processing disputes and correcting data retrospectively, thus better meeting BSC Objective (d).</p>
Electricity North West Limited	Yes	The modification provides clarity for parties regarding their roles and responsibilities so preventing risks to settlements.
National Grid	Yes	P283 better facilitates the Applicable BSC Objectives compared to the current position.
RWE npower	Yes	We agree with the Panel's initial recommendation as we believe that it will drastically improve commissioning of metering systems.
ScottishPower Group	Yes	<p>ScottishPower agrees with the Panel's recommendation that P283 should be approved as we believe that P283 would better achieve the Applicable BSC Objectives (c) and (d) that it:-</p> <ul style="list-style-type: none"> • Clarifies obligations and responsibilities on individual groups of parties; • Reduces settlement inaccuracies and risk to BSC

Respondent	Response	Rationale
		parties; and <ul style="list-style-type: none"> Reduces settlement risk and TAA non-compliances.
SSE Energy Supply Ltd	Yes	SSE are in agreement that this solution would better facilitate Objectives (b) and (d). Agree with page ref: 24
SSE Power Distribution	Yes	SSEPD agree with the panel's unanimous view that P283 facilitates the applicable BSC objectives.
TMA Data Management Ltd	Yes	-
UK Power Networks	Yes	We accept that to achieve commissioning requirements in some circumstances, such as live commissioned HV or EHV environments that a HHMOA may be unable to inspect equipment to the extent necessary and to avoid supervisory burden
Western Power Distribution	Yes	This modification will improve the assurance process in certain cases and it therefore addresses the identified defect. However, see Q4 response regarding the potential for new issues to arise as a result of these changes.

Question 4: Do you have any further comments on P293?

Summary

Yes	No	Neutral/Other
5	7	0

Responses

Respondent	Response	Rationale
Association of Meter Operators	Yes	5.3.1 – worth noting that MOCOPA® makes the Distributor responsible for provision/adoption and on-going responsibility of measurement transformers and test terminal block. http://www.mocopa.org.uk/assets/documents/MOCOPA%20v3.4.pdf para 4.1.2 (page 58). This approach also supports the D0170/D0215 interaction described in the BSC. No need to change anything, but will mean that Distribution System Operator will be the normal BSC Party commissioning the measurement transformers.

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		The implementation date should be a backstop, the industry should seek to develop further detail (guidance note and template forms) and implement this more robust commissioning process as soon as possible.
British Gas	No	-
EDF Energy	Yes	Where the equipment owner is not a BSC Party, it may remain difficult to ensure that the correct commissioning data is provided. Where subsidiaries or affiliates of BSC Parties are owners of equipment, the proposal may have limited effect.
Electricity North West Limited	No	-
National Grid	No	-
RWE npower	Yes	<p>1. Extend the MOD to include NHH commissioning where the metering is operated by measurement transformers (this would capture both the HV and LV sites which are traded as NHH but can be prone to the same errors as HH traded sites).</p> <p>2. Where the equipment owner is not a BSC Party we do not believe the MOA is best placed for the registrant to fulfil its obligations through. In most cases the MOA will not be aware of the identity of the equipment owner and by the time it comes to light that this is not the network operator, enough time will have passed that it will be extremely difficult for the MOA to fulfil the requirements placed upon it. The network operator however, should be able to as they will ultimately have to approve the energisation of the site onto their network and so be involved in the process and aware that they are not the equipment owner much earlier and so seems best placed to fulfil the obligations.</p> <p>3. We also still feel that a common approach across the industry to how commissioning issues are escalated is needed. With more and more MOAs now operating nationally and on behalf of multiple suppliers, running various different processes does not seem a sensible approach. This may be achieved via DTC flows or by a working practice but something needs to be in place.</p>
ScottishPower Group	No	-

Respondent	Response	Rationale
SSE Energy Supply Ltd	No	-
SSE Power Distribution	No	-
TMA Data Management Ltd	No	-
UK Power Networks	Yes	<p>We observe that it remains an option for the connected customer to provide CTs and VTs and Testing Facilities as part of their connection arrangements and that there is no absolute obligation for the ownership of such equipment to reside only with the relevant licenced distributor or a relevant licence exempt distributor.</p> <p>The full requirements for manufacturer’s certificates and commissioning test records might therefore in some cases remain with the HHMOA.</p>
Western Power Distribution	Yes	<p>Our further analysis of these proposals has identified a concern that the revised process legitimises those MOAs which commission only from the Test Terminal Block rather than trying to establish the primary current and checking the metering system as a whole is consistent with independently measured load. The modification has addressed the problem that MOAs cannot always commission in this way (e.g. for some HV sites) by saying they need never do it. Instead we have a process where the DNO tests its metering equipment (CTs/VTs/pilot cable/TTB) and later the MOA tests its meter but nobody tests the complete metering system at all. The MOA can just check the two sets of records are consistent as a back office process. Whilst this may make for better assurance for those metering systems where there is no alternative it will have the opposite effect for the vast majority of metering systems. It is likely the MOAs will adopt the same field commissioning for NHH CT metering where even these back office checks will not be in place.</p> <p>In addition, the changes require the equipment owner to “prepare, and make available to the appointed MOA, complete and accurate commissioning records”, however, there is no direction as to the form these records are to take, how they are to be made available, and in what timescales. If the timescales are fairly short this may be difficult for DNOs, especially where an ICP has</p>

Respondent	Response	Rationale
		<p>constructed and commissioned the site and the DNO has subsequently adopted it. Further clarification would be required on whether records are to be made available as a matter of course or on request. If the former then it may be preferable if a standard form was devised (e.g. a new Appendix to CoP4) which is left at the meter position (in the same way as the label of CT & VT technical details are currently done under MOCOPA). If the latter, clarification would be required on the mechanism for requesting this information. (MOAs currently request technical details for CTs and VTs using a D0170 dataflow and any records are sent using a D0215 dataflow).</p> <p>The MOA should check the overall accuracy of the complete Metering System through their on-site testing and only rely solely on the information exchange detailed in P283 where they cannot establish the primary load.</p>