

CP Consultation Responses



CP1496 'Introduction of two data flows for the Commissioning process for Half Hourly (HH) Supplier Volume Allocation (SVA) Current Transformer (CT) operated Metering Systems'

This CP Consultation was issued on 6 November 2017 as part of CPC00782, with responses invited by 1 December 2017.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
British Gas	1	Supplier
BUUK Infrastructure	2	Distributor
E.ON UK	2	Supplier; Supplier Agent (DC/DA/MOA)
Electricity North West Limited	1	Distributor
IMServ Europe (UKDC)	1	Supplier Agent
Northern Powergrid	1	Distributor
Scottish Power	2	Supplier; Supplier Agent
Siemens Managed Services	1	Supplier Agent (HHMOA)
SP Distribution SP Manweb	1	Distributor
SSE Energy Supply Limited	2	Supplier; supplier Agent
TMA Data Management Ltd	1	Supplier Agent (HHDC, HHDA, NHHDC, NHHDA and MOA)
UK Power Networks	3	Distributor
Western Power Distribution	1	Distributor; Supplier Agent
Npower	6	Supplier; Generator; Non Physical Trader

CP1496
CP Consultation Responses

7 December 2017

Version 1.0

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Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
British Gas	✓	✓	✓	✓
BUUK Infrastructure	✓	✓	✓	✗
E.ON UK	✓	✓	✓	-
Electricity North West Limited	✗	✓	✓	✗
IMServ Europe (UKDC)	✓	✓	✓	
Northern Powergrid	✓	✓	✓	✗
Scottish Power	✓	✓	✓	✗
Siemens Managed Services	✓	✓	✓	✗
SP Distribution SP Manweb	✓	✓	✓	✗
SSE Energy Supply Limited	✗	✓	✓	✗
TMA Data Management Ltd	✗	✓	✓	-
UK Power Networks	✓	✓	✓	✗
Western Power Distribution	✓	✓	✓	✗
Npower				

Question 1: Do you agree with the CP1496 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
11	2	0	1

Responses

Respondent	Response	Rationale
British Gas	Yes	No rationale given
BUUK Infrastructure	Yes	We agree that CP1495, CP1496 and CP1497 are an improvement to the current process which is extremely resource intensive and creates confusion. The steps proposed should reduce both of these aspects and improve settlement as a result.
E.ON UK	Yes	In general, we would be supportive of CP1496 on the basis that it should help improve the process around commissioning and make things more linear and streamlined for all parties.
Electricity North West Limited	No	<p>We have identified a number of issues with the draft proposals.</p> <p>For the DAXXX dataflow, ELEXON has suggested that the current process has a number of issues which will be resolved via the proposal. Our review of the proposal suggests that this is not the case.</p> <ul style="list-style-type: none"> The proposed data flow process will create a cost impact on the businesses for the new data flows and processes that is highly likely to exceed the current resource expense with little or no benefit to companies or customers. We will also be required to exchange the calibration certificates via the current route regardless of the proposal. ELEXON has not made the case as to why the current process is difficult to audit. Copies of emails sent to the MOA should provide adequate evidence to demonstrate that records have been sent through to the relevant party. We do not believe that the additional cost of the required changes delivers an enhanced level of assurance. The issues around increased chances of errors are unlikely to be resolved via the use of a dataflow as the information will need to be manually input to the system from the base records (usually the PDF records we send to MOAs) The current delays in information retrieval are not due to the inability to locate the records on the system but due to the lack of records. This is a known issue for a number of companies and may reflect a number of different issues. If we do not hold the records, the system cannot be populated to provide the flows.

Respondent	Response	Rationale
		<p>We have no specific issues with the retention of documents or the amended timescales for the process.</p> <p>We therefore do not agree with the proposed solution.</p>
IMServ Europe (UKDC)	Yes	No rationale given
Northern Powergrid	Yes	Yes, we agree with the change as the current process of providing evidence of commission to MOAs is a manual activity at present. The creation of the flows will allow for a more efficient process.
Npower	Yes	<p>CP1496 is reflective of the changes created by DTCP CP 3522. The CP introduces two new commissioning flows to help assist the P283 project and technical assurance.</p> <p>Npower supports this change as per our comments in regards to DTC CP 3522, however we have a few concerns as noted below.</p> <p>Whilst the improvement in emails regarding part one commissioning is welcomed as this would benefit Npower by having a record trail through the flow format, the manual error and misplaced documents via emails can become problematic. Having a flow record is helpful to tracking the process of site information. Potential risks could also mean that IT services and Hotmail addresses could become non-existent and therefore we risk the fact that the emails could be lost in transit.</p> <p>The layout of the flows is basically is a duplicate of what is sent in the form of the part one commissioning document from the DNO (Distribution Network Operator) to the Half Hourly Meter Operator Agent (HHMOA) and Supplier.</p> <p>The only concern is that the DNO may not be following the obligations set upon them. This has been discussed in numerous cases where the HHMOA have to chase up a response from the DNO to acquire commissioning Part 1 and there is no response.</p> <p>Also as mentioned in our previous response for DTC CP 3522 regarding the introduction of the new flows, it seems that supplier will not be a recipient 'Notification of Commissioning Information'; So in the event of any details being missing, we [Supplier] could chase DNO, but wouldn't know if the information has been sent until MOP confirmed everything was fine.</p> <p>Although the commission documents will be retained by the party responsible for commissioning the equipment, it would be beneficial to have timescales associated for delivery of these documents to supplier when they are requested</p>
Scottish Power	Yes	We agree with the introduction of data flows around the commissioning process, as this is a vast improvement on sending emails. However, this will not resolve the underlying issues of incomplete commissioning records, which we believe a full review

Respondent	Response	Rationale
		of the commissioning process is required, especially around the responsibilities for providing commissioning records from non-BSC parties and DNO's
Siemens Managed Services	Yes	Agree that the proposed solution will provide a more robust mechanism for the transfer of commissioning information, and notification of any defects.
SP Distribution SP Manweb	Yes	No rationale given
SSE Energy Supply Limited	No	<p>We have assessed CP1496 and CP1497 alongside the equivalent DTC proposal, 'DTC CP3522 – BSC Meter Commissioning Data Flows' as this is a cross-code issue. We would like to make it clear that support the principle of CP1496, CP1497 and DTC CP 3523 and recognise that a DTC solution is more secure and auditable than the existing email transfer. However, we remain concerned by the process of MOA-MOA transfer of the DAXXX flow as discussed at previous working groups.</p> <p>Our response to the DTC CP is as follows,</p> <p>"We support the principle of sharing commissioning records via the DTN to improve the auditability and general robustness of the process. Our concern is that that the DAXXX data flow is sent MOA to MOA, as opposed to solely being sent LDSO to MOA.</p> <p>We are of the view that the LDSO should act as the single source of truth because in the majority of cases their own the equipment and therefore own the data. Transferring the detailed records in the DAXXX between MOAs suggests the MOA becomes the owner of the data. On a Change of Agent, we believe it is far more robust and reasonable for the incoming MOA to contact the owner/ source of the data (LDSO) to ensure the data they are requesting is accurate and up-to-date. Furthermore, if the LDSO owned data is shared MOA to MOA and there is an error in the data, then it suggests the outgoing MOA has also become responsible, to some extent, for the potential settlement risks/ errors arising from the incorrect data.</p> <p>We remain supportive of transferring the full commissioning record LDSO to MOA (DAXXX) and the minimal commissioning information (DBXXX) being sent MOA to MOA.</p> <p>We are currently reviewing the related BSC CPs, but we believe the issue of sending DAXXX MOA to MOA is the only concern we have with this proposal."</p>
TMA Data Management Ltd	No	<p>We understand that Elexon is looking at the issue of MOA being responsible under the BSC for ensuring that the commissioning is done correctly even if not completed by the MOA or LDSO as well as providing the commissioning details. However we are concerned that it leaves the MOA wide open to be in breach of its obligations under the BSC through no fault of its own. The change is likely to be implemented before any resolution to this particular issue is found.</p>

Respondent	Response	Rationale
UK Power Networks	Yes	No rationale given
Western Power Distribution	Yes	We support and agree the rationale for introducing the two new flows, we have however, voiced our opinion in connection with the associated DTC changes in that we have concerns about the duplication of data being provided in the new DAXXX flow also being provided in the D0215 flow. However, we have been assured that the understanding of the new flow will be that the MOA will use the DAXXX flow to request the meter technical details rather than sending a D0170 to request a D0215.

Question 2: Do you agree that the draft redlining delivers the CP1496 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
12	1	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
British Gas	Yes	No rationale given
BUUK Infrastructure	Yes	No rationale given
E.ON UK	Yes	No rationale given
Electricity North West Limited	Yes	We agree that the draft redlining delivers the proposed solution but disagree with the proposed solution.
IMServ Europe (UKDC)	Yes	No rationale given
Northern Powergrid	Yes	No rationale given
Npower	N/A	No rationale given
Scottish Power	Yes	We agree with draft redlining
Siemens Managed Services	Yes	No rationale given
SP Distribution SP Manweb	Yes	No rationale given
SSE Energy Supply Limited	Yes	No rationale given
TMA Data Management Ltd	Yes	No rationale given
UK Power Networks	Yes	No rationale given
Western Power Distribution	No	Our understanding of the associated DTC change proposals is that on receipt of a DBXXX flow from a supplier, the LDSO will use the DBXXX flow to communicate back to the Supplier to inform them of any action taken to resolve an omission or defect that is relating to the CT/VTs. The BSCP changes do not include this scenario.

Respondent	Response	Rationale
		<p>The SVA Data Catalogue Volume 1 – Data Interfaces Appendix A do not indicate a DBXXX LDSO to Supplier instance of the data flow.</p> <p>In addition, both the red-lined changes in BSCP 515 and BSCP 514 make reference in a footnote to:</p> <p>“DAXXX Notification of Commissioning information contains BSCO maintained valid sets for measurement transform ratios. For updating these valid sets with additional ratios go to section BSCP515 3.15.”</p> <p>The creation of section 3.15 appears to be an additional change to BSCP515 which is not included with this CP1496.</p>

Question 3: Will CP1496 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
14	0	0	0

Responses

Respondent	Response	Rationale
British Gas	Yes	Internal system changes to ensure processing and reporting of new dataflows where necessary
BUUK Infrastructure	Yes	We will need to update internal documentation, prepare and brief internal personnel and configure and route the new dataflows into our system(s).
E.ON UK	Yes	As a MOA we would have to undertake a system and process update to include the new flows.
Electricity North West Limited	Yes	Electricity North West has developed a solution to provide the required information to MOAs by creating new business processes. The proposed solutions would require modifications to the current IT infrastructure and for the transfer of the existing and new measurement transformer information received into the data flows.
IMServ Europe (UKDC)	Yes	Our 3rd party Wheatley MOP database (for NHH & HH) will need to go through the whole change cycle in order to be updated to accept and process the new flow sand new data items. With this also come's changes to Operational documents and processes. These changes are substantial; it will take time to design build, rushing it though could result in issues further down the line.
Northern Powergrid	Yes	Yes, this change will impact our organisation and will necessitate internal process and systems alterations to accommodate the new dataflow.
Npower	Yes	The impact to the business from this CP will fall in line with Supplier and HHMOA processes, the creation of the two new flows will result in changes to the Supplier/HHMOA processes (LWPS). On a plus note the impact of creating these flows would provide a further confidence in our settlement process and ensure that the customer has a correct CT ratio and commissioning carried out on their site and would also provide notification of why an appointment is not to go ahead saving the business money on failed on the day appointments. As new flows will be created which we will be required to receive and send we will need to understand the cost for updating current systems to support this functionality.
Scottish Power	Yes	This will be a large change to our current commissioning process as it will require significant system changes as this is currently dealt with by email. Therefore will require our commissioning documents to

Respondent	Response	Rationale
		be updated and staff retrained to ensure that the correct process is followed.
Siemens Managed Services	Yes	<p>There will be impact to our organisation in the role of MOA; significant system and process changes will be needed to support the transfer of commissioning information via the new data flows.</p> <p>Detailed system analysis will be required to specify the changes needed to our MO portfolio application and data flow processing and routing functionality, followed by the actual software development and testing. There will be considerable change to back office business processes associated with commissioning data, which will require revision of existing documentation, with associated training to users.</p>
SP Distribution SP Manweb	Yes	<p>Currently commissioning data is held on a paper form and scanned into an appropriate storage area and as such we will require process changes to implement CP 1496 along with the potential changes to our systems. In addition we will require to develop a technical solution which will enable us to transfer data from certificates into the specified flow format.</p>
SSE Energy Supply Limited	Yes	<p>We will need to implement business process and system changes for our HHMOA and Supply business to manage the new data flows.</p>
TMA Data Management Ltd	Yes	<p>Our systems and procedures would be impacted</p>
UK Power Networks	Yes	<p>No rationale given</p>
Western Power Distribution	Yes	<p>Yes there will be considerable changes to our systems and hand held devices to capture and process the information required to populate the new flows. Staff training across all our network areas along with process and policy document changes.</p>

Question 4: Will your organisation incur any costs in implementing CP1496?

Summary

Yes	No	Neutral/No Comment	Other
13	0	0	1

Responses

Respondent	Response	Rationale
British Gas	Yes	Mostly one off configuration costs
BUUK Infrastructure	Yes	These will be one off minimal costs
E.ON UK	Yes	We will incur one-off IT costs to implement the new flow into our system.
Electricity North West Limited	Yes	We estimate the IT costs of the proposal will be approximately £20,000. We will need to transfer the existing data into the systems which will attract additional one off costs (as yet determined). There will also be small ongoing costs associated with the transfer of data from records.
IMServ Europe (UKDC)	Yes	Wheatley development and project related costs, plus ongoing costs to trigger flows and manage exceptions
Northern Powergrid	Yes	The changes required to systems and processes will have associated costs, though we cannot estimate these at present as a full impact assessment by our IT provider is required.
Npower	Possibly	We cannot comment on the implementation costs at this time.
Scottish Power	Yes	Yes, Impact assessment required to confirm overall costs.
Siemens Managed Services	Yes	There will be internal costs associated with analysis, design, testing, process updates and training, and significant external costs will be incurred for software development. Without confirmed details of the flow structure and content at this stage, it is not possible to obtain estimates for timescales or cost of this work.
SP Distribution SP Manweb	Yes	As with all IT system changes there is a cost, however at this time it is not possible to quantify such costs.
SSE Energy Supply Limited	Yes	There will be on-off costs to implement the new process to manage these flows, and some ongoing costs to operate the new process.
TMA Data Management Ltd	Yes	Tehre would be a medium to high cost to implementing CP1496 for development, testing and implementation as well as on-going operational cost.
UK Power	Yes	No rationale given

Respondent	Response	Rationale
Networks		
Western Power Distribution	Yes	Costs will be incurred in making the necessary company policy document changes, amending company systems and processes and to briefing / training staff on the revised requirements.

Question 5: Do you agree with the proposed implementation approach for CP1496?

Summary

Yes	No	Neutral/No Comment	Other
3	9	0	2

Responses

Respondent	Response	Rationale
British Gas	Yes	No rationale given
BUUK Infrastructure	No	Whilst the changes for this CP are minimal we have not advocated the proposed implementation approach for CP1495 and on the basis that the date should be aligned with all other CP's we would not support this implementation date for CP1496.
E.ON UK	Other	We agree that it makes sense to introduce the BSC and DTC changes at the same time.
Electricity North West Limited	No	We disagree with the proposed CP1496 solution.
IMServ Europe (UKDC)	Yes	No further comments
Northern Powergrid	No	Although we approve the change in principal, we reject the proposed implementation date due to significant system and process changes required internally. Due to the level of changes required within the organisation, we would prefer a November 2018 implementation date
Npower	No	Implementation should not be before November 2018. Since the related MRA change (DTC CP 3522) implementation date is now November 2018, the implementation for CP 1496 should also be pushed back to that date.
Scottish Power	No	We would prefer a November 2018 implementation date, as related changes CP1495 and CP1497, if approved will require significant process and system changes.
Siemens Managed Services	No	<p>Agree the implementation should coincide with MRASCO's DTC Change proposal, but we would require a longer lead time in order to adequately design, develop and test the system changes required to facilitate the new data flow. The volume of work required would not be achievable by June 2018, and would suggest a more realistic implementation date of February 2019.</p> <p>We note similar comments on timescales and implementation dates in the responses to the MRA consultation on DTC CP 3522, which defines the new flows; with the majority of respondents saying that a June 2018 implementation is not practical and proposing a February 2019 or November date.</p>

Respondent	Response	Rationale
SP Distribution SP Manweb	No	As per our response to CP1495, given that the associated MRA changes have now been given a revised implementation date of November 2018, we believe that it makes sense to implement both the MRA changes along with CPs 1495 1496 and 1497 simultaneously as they are intrinsically linked, therefore the BSC changes implementation date should be altered to November 2018 to ensure that this happens.
SSE Energy Supply Limited	Other	We agree that there should be a minimum 6 month lead time between the approval of this BSC CP and the equivalent DTC CP and therefore accept the June 2018 implementation date that has been proposed. However, we note that MDB (30/11) approved a November 2018 implementation date and we expect this BSC CP to be implemented in November 2018.
TMA Data Management Ltd	Yes	We support the 65Wd after energisation for the Supplier to resolve any gap
UK Power Networks	No	At November MDB (MRA Development Board) meeting, it was agreed to amend the implementation date of DTC CP 3522 and DTC CP 3523 to 1 November 2018. Therefore it seems pragmatic for CP1496 to also be implemented on 1 November.
Western Power Distribution	No	We believe that the implementation date should align with the associated DTC change and therefore should be amended to 1st November 2018.

Question 6: Do you agree with the new timings for Commissioning proposed as part of the CP1496 solution?

Summary

Yes	No	Neutral/No Comment	Other
14	0	0	0

Responses

Respondent	Response	Rationale
British Gas	Yes	No rationale given
BUUK Infrastructure	Yes	No rationale given
E.ON UK	Yes	We agree that the new timings are reasonable.
Electricity North West Limited	Yes	We have no comment on the revised timetables.
IMServ Europe (UKDC)	Yes	Yes, although measuring & monitoring MOP activities at 32, 65 & 80 working days may not be straight forward, additional tools (within individual organisation's) for managing the process will need to be developed.
Northern Powergrid	Yes	Due to there being minimal changes to the timings we agree with the proposed solution
Npower	Yes	We agree with all the new timings for the commissioning proposed as part of CP1496.
Scottish Power	Yes	We agree with the proposed timings.
Siemens Managed Services	Yes	We see this as 'hardening' the timescales introduced by CP1458 that we are now working to for P283 commissioning. The introduction of DTC flows will allow the monitoring of the SLAs for the various process steps to be automated and allow a more efficient approach than the manual monitoring of emails.
SP Distribution SP Manweb	Yes	No rationale given
SSE Energy Supply Limited	Yes	No rationale given
TMA Data Management Ltd	Yes	We welcome the extended timescales for the MOA to attempt commissioning for the first time.
UK Power Networks	Yes	No rationale given
Western Power Distribution	Yes	No rationale given

Question 7: Do you agree with the new timings for defect or omission rectification proposed as part of the CP1496 solution?

Summary

Yes	No	Neutral/No Comment	Other
13	1	0	0

Responses

Respondent	Response	Rationale
British Gas	Yes	No rationale given
BUUK Infrastructure	Yes	No rationale given
E.ON UK	Yes	We agree that the new timings are reasonable.
Electricity North West Limited	Yes	We have no comment on the revised timetables.
IMServ Europe (UKDC)	Yes	No further comment
Northern Powergrid	Yes	We agree that target times are achievable in most scenarios. However, there may be occasions where a defect or omission cannot be rectified within the timescales due to practical reasons e.g. an outage is required to investigate/rectify an issue. This may result in a required extension to the timescales. We believe consideration should be made for this type of scenario in the event of a non-compliance report.
Npower	Yes	We agree with all the new timings for the commissioning proposed as part of CP1496.
Scottish Power	Yes	We agree with the new timings for defects or omissions as it provides a more realistic timescale for completing commissioning where it was unable to be fully completed in the first instance. However, having a 80 day deadline to complete all aspects of commissioning will not always be possible and the current issues which have prevented commissioning will still be there, which is why we believe a full review of the commissioning process is required.
Siemens Managed Services	Yes	We see these as being practical and workable.
SP Distribution SP Manweb	Yes	While we agree with the rationale for the new timings for defects or omission rectification we believe that given the complexity of the overall process parties may find it difficult to meet such timings if for any reason if there are unforeseen delays in the process.
SSE Energy Supply Limited	Yes	No rationale given
TMA Data	Yes	We support the 65Wd after energisation for the Supplier to resolve any gap or defect and the 15 WD

Respondent	Response	Rationale
Management Ltd		after the Supplier's deadline for the MOA to complete commissioning.
UK Power Networks	Yes	No rationale given
Western Power Distribution	No	No timing has been indicated for the LDSO/HHMOA to respond to the Supplier sending a DBXXX Notification of Commissioning Status. [BSCP 514 5.2.A.6]

Question 8: Do you agree that Commissioning records should be retained by those responsible for Commissioning rather than being transferred to the Meter Operator Agent?

Summary

Yes	No	Neutral/No Comment	Other
13	1	0	0

Responses

Respondent	Response	Rationale
British Gas	Yes	No rationale given
BUUK Infrastructure	Yes	No rationale given
E.ON UK	Yes	We agree that commissioning records should be retained by those responsible for the commissioning.
Electricity North West Limited	Yes	We have no issue with the proposals. We believe it is sensible for the party with the enduring relationship with the metering system to retain the records. We do have one question on how this would be achieved if the commissioning company is an ICP?
IMServ Europe (UKDC)	Yes	Definitely, the transfer of the original documentation is a key issue and this new approach overcomes this.
Northern Powergrid	Yes	We agree with this statement but we believe it is important that the MOA accepts the dataflow as evidence of commission. We would not expect MOA to also request documents from us as the LDSO.
Npower	No	We believe that the commission record (in this case the LDSO commissioning document Part 1) should be held by all parties relevant to the commissioning process, such as the supplier, HHMOA and LDSO to ensure that the accuracy of the metering and therefore the subsequent commission carried out by the meter operators. Without proof of commissioning from the LDSO we are unclear of what the ratio etc. will be.
Scottish Power	Yes	We believe this is a sensible approach.
Siemens Managed Services	Yes	Currently the success rate of the transfer of LDSO Commissioning records and CT/VT certificates is our experience is low. This in line with the experience of HHMOAs across the Industry. This results in MOA failing TAA commissioning audits for reasons that at outside their control. Therefore it is logical the LDSO retains the documentation (assuming that owns the equipment) and provides it directly to the TAA auditors.
SP Distribution SP Manweb	Yes	While we recognise that the commissioning records should be held by those responsible for commissioning, it should be noted that the Meter Operator Agent (MOA) will be the sole party that will hold a complete record of the site commissioned, albeit that the calibration record will be held by the

Respondent	Response	Rationale
		LDSO. The MOA will have received the appropriate CT/VT commissioning information from the LDSO to enable it to successfully commission the metering element of the connection, therefore as such it will hold the complete commissioning record for the site. Given this position as an LDSO we would expect that the MOA passes on all relevant information to the new MOA as part of the Change of Agent process and we recognise that CP1497 attempts to address this issue.
SSE Energy Supply Limited	Yes	No rationale given
TMA Data Management Ltd	Yes	No rationale given
UK Power Networks	Yes	No rationale given
Western Power Distribution	Yes	No rationale given

Question 9: Do you have any further comments on CP1496?

Summary

Yes	No
5	9

Responses

Respondent	Response	Comments
British Gas	No	No further comments
BUUK Infrastructure	No	No further comments
E.ON UK	No	No further comments
Electricity North West Limited	Yes	We suggest that one of the easiest methods to improve the commissioning process may be to remove the requirement to issue calibration certificates and that the National Measurement Transformer Error Statement tolerances should be used instead.
IMServ Europe (UKDC)	Yes	<p>The changes are significant and have yet to be approved, June 2018 is optimistic for changes on this scale.</p> <p>Will there be any rules which detail how this data is stored by the commissioning party, for example will it be .JPEG, .PNG, paper, excel, word or PDF? At the moment we see all of the above.</p> <p>In my view COP4 should be prescriptive about the tests the DNO & MOPs conduct to complete their Commissioning Test, and COP4 should also mandate the forms on which the results are recorded, at the moment everyone takes a different approach and completes their own version of a Commissioning document, the next step should be to standardise this nationally.</p> <p>Are there any documented changes to the TAA process, for example will the TAA agent request commissioning evidence from the Current MOP, or the old MOP who completed the commissioning test?</p>
Northern Powergrid	No	No further comments
Npower	No	No further comments
Scottish Power	Yes	To ensure that there is a robust process, for the supplier to resolve defects/omissions and take appropriate action against Non BSC & BSC Parties, we believe that it would be beneficial if a DCUSA change was raised for distributors to provide commissioning records to incentivise them, to ensure that their commissioning records are provided.
Siemens Managed Services	No	No further comments

Respondent	Response	Comments
SP Distribution SP Manweb	No	No further comments
SSE Energy Supply Limited	Yes	We believe there was a great deal of improvement in cross-code working between the BSC and MRA in developing these proposals. We do, however, believe it is necessary for the equivalent committees to have sight of the industry responses to both code consultations prior to making a decision to approve or reject. This would enable both committees to be in a possession of the full industry view ahead of making a decision. We have raised the same point under the MRA and would welcome Elexon considering how this could work under the BSC to support CACOP.
TMA Data Management Ltd	No	No further comments
UK Power Networks	Yes	Will Elexon be providing any guidance notes regarding CP1496?
Western Power Distribution	No	No further comments

CoP4

Respondent	Location	Comment
Electricity North West Limited	P6 5.5.4 Records	"Where measurement transformers are owned by a BSC Party, that Party". Needs a comma
Electricity North West Limited	P6 5.5.4 Records	All evidence must be Traceable – needs a lower case "t" – not a defined term.

BSCP514

Respondent	Location	Comment

BSCP515

Respondent	Location	Comment

SVA Data Catalogue Vol 1

Respondent	Location	Comment

SVA Data Catalogue Vol 1

Respondent	Location	Comment