

# CP Consultation Responses



## CP1527 'Increase the minimum data storage capacity for Settlement Outstations and mandate specific selectable integration periods for Metering Codes of Practice'

This CP Consultation was issued on 10 February 2020 as part of CPC00802, with responses invited by 6 March 2020.

### Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Association of Meter Operators	1	Meter Operators (MOA)
IMServ	2	Data Collector (DC) and MOA
Honeywell	1	Outstation Manufacturer
Siemens Managed Applications & Services	3	Central Volume Allocation (CVA) MOA, Half Hourly Meter Operator (HHMOA) and Half Hourly Data Collector (HHDC)
Npower	1	Supplier
Stark	4	HHDC, Half Hourly Data Aggregator (HHDA); NHHDC, Non Half Hourly Data Aggregator (NHHDA)
SMS Energy Services Ltd	2	Non Half Hourly Meter Operator (NHHMOA), HHMOA
TMA Data Management Ltd	4	HHDC, HHDA, NHHDC and NHHDA
EDF	1	Supplier Agent (not stated)
SSE Energy Supply Limited	1	Supplier

CPXXXX  
CP Consultation Responses

dd Month yyyy

Version 1.0

Page 1 of 15

© ELEXON Limited 2020

## Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
Association of Meter Operators	✓	✗	✗	✓
IMServ	✓	✓	✓	✓
Honeywell	✗	✓	-	✗
Siemens Managed Applications & Services	✗	✓	✓	✗
Npower	✗	✓	✓	✓
Stark	✓	✗	✗	✓
SMS Energy Services Ltd	✓	✓	✓	✓
TMA Data Management Ltd	✓	✗	✗	✓
EDF	✗	-	-	-
SSE Energy Supply Limited	✓	✓	✓	✓

## Question 1: Do you agree with the CP1527 proposed solution?

### Summary

Yes	No	Neutral/No Comment	Other
6	4	0	0

### Responses

Respondent	Response	Rationale
Association of Meter Operators	✓	As the initiator of Issue 80 I am keen that the Metering CoPs are brought up to date
IMServ	✓	<p>The increase to 250 days per channel would lower the amount of data that is not retrieved due to prolonged comms faults for new installations.</p> <p>As a DC we welcome this change.</p>
Honeywell	✗	<p>The increase in data storage seems excessive, for the following reasons:</p> <ol style="list-style-type: none"><li>1. The UK uses 30min data for settlement systems, this has recently been reinforced by the 30minute demand periods introduced in all SMETS meters (the number of these will vastly out way the number of CoP install on the network)</li><li>2. By introducing the requirement for 250days then the test time to test &amp; approve any meter will have to increase to 250days (to ensure correct wrap-around) this would prevent the timely introduction of new metering types to the market, as meters become more secure loading of dummy data / accelerated testing should be less likely to be offered.</li><li>3. While the consultation states 17 out of 32 outstations already meet this requirement, they are not tested or proven to do so.</li><li>4. Other outstations would need to be modified to meet this requirement, this maybe a fundamental change. Therefore, in the short to medium term it would lead to a reduction of competition in these segments and potentially increase cost of product and encourage the use of less well proven products</li><li>5. Adding configurability to the demand periods maybe future proofing but it should be carefully considered, as testing each of these integration period options will significantly increase test time.</li></ol>

Respondent	Response	Rationale
		<p>If configuration is necessary then, it would be sensible to limit it to 15mins and 30mins.</p> <p>6. The proposal appears to be suggesting a change 'because it seems like a good idea', there does not appear to be any practical reason for the change. If future proofing is required then we would suggest an increase to 93days of storage should be more than sufficient.</p>
Siemens Managed Applications & Services	x	<p>Although we agree with the principle of CP, it appears to us that there are some shortcomings in the proposed solution.</p> <p>It is not clear what happens to existing unused meters after the Implementation Date, will they be allowed to be installed if they don't have the minimum new storage capacity or do not support alternative ISP? Potentially there is the cost of stock write-off.</p> <p>We haven't seen any evidence that aligning the meter storage capacity to the settlement calendar really going to deliver industry benefits. Has any quantified analysis been done that supports this argument?</p> <p>The step-change in storage capacity to 250 days minimum could result in the reduction (hopefully just for a limited time) of available meters and result in a price increase. From our analysis we believe that currently for SVA only EDM I meters would meet these requirements. Is it know if meter manufacturers are committed to having meter models that meet these new requirements available to buy before the Implementation Date?</p> <p>We view this CP as an enabling Change that will allow meters to cater for any modification of the Imbalance Settlement Period duration and increase in volume of data that will be needed to be stored. We do however question the reference on page 3 of the Consultation report to the ISP changing to 15 minutes as of 1 January 2021; which we will expand on in answer to Question 6.</p> <p>Additionally, on page 5 of the Consultation report in the Proposer's rationale of the Solution section there is the statement</p> <p>"the Issue Group did not believe the costs associated with increasing the minimum data</p>

Respondent	Response	Rationale
		<p>storage requirement for Settlement Outstations would be significant;"</p> <p>Although it might be correct that the requirement for new meters meet the new minimum storage capacity should not be a significant increase the unit cost of the meter, the potential cost of having to replace existing meters that don't meet the requirement of alternative ISP could be significant.</p>
Npower	x	<p>Whilst we are supportive of the change objectives, we do not support the rationale of increasing the minimum data storage capacity for Settlement Outstations to increase to 250 days per channel.</p> <p>Within your rationale, you reference that some Outstation manufactures are currently producing Outstations which meet the proposed requirements (17 out of 32 Outstations would already meet the requirement) meaning that a large proportion do not.</p> <p>Our data can be dialled back to a minimum of 90 days with regards to Elster metering and 100 days for EDM1. Therefore a solution beyond 90 days would require us to make changes at a cost.</p> <p>Have Meter Asset Provider views been considered? It is our understanding that most meters dial a minimum of 90 days, so there must be a greater understanding of the potential scale of the change (and costs) to support a move to 250 days.</p> <p>From a metering MOP perspective, we do not see a reason for differences depending on the CoP. Whilst SMETS are not included, we believe that CoP 1 through to 10 should all be set at 90 days minimum.</p> <p>Therefore, we reject the solution as we do not support a move to 250 days</p>
Stark	✓	<p>Agree on the change should help mitigate certain risk as it will give Registrants/HHMOAs/CVA MOAs more time to successfully retrieve HH metered data from Outstations that have a comms fault or are on permanent hand held reads and sites where access is difficult to secure, when site visits are required.</p> <p>CP:</p> <ul style="list-style-type: none"> <li>• Increase the minimum data storage capacity for Settlement Outstations to 250 days per channel,</li> </ul>

Respondent	Response	Rationale
		<p>at 30 minutes integration periods, for CoPs 1, 2, 3, 5 and 10; and</p> <ul style="list-style-type: none"> <li>Mandate specific, selectable, integration periods for CoPs 3, 5, and 10 and add a test for this requirement (into CoPs 1, 2, 3, 5 and 10) into BSCP601.</li> </ul>
SMS Energy Services Ltd	✓	We agree that the proposed solution will provide benefits to settlement as more data can be retrieved from meters in the events of outages which could currently cause loss of data.
TMA Data Management Ltd	✓	
EDF	✗	We do not recommend, because our meters do not hold data for the proposed period.
SSE Energy Supply Limited	✓	We support the proposal to increase the minimum data storage requirements for settlement outstations in order to reduce the risk of estimated data entering settlement due to overwritten data.

## Question 2: Do you agree that the draft redlining delivers the CP1527 proposed solution?

### Summary

Yes	No	Neutral/No Comment	Other
7	1	2	0

### Responses

A summary of the specific responses on the draft redlining can be found at the end of this document.

Respondent	Response	Rationale
Association of Meter Operators	✓	
IMServ	✓	The only change would be to clarify bullet point 2 in the proposers' rationale to add the words 'per channel' at the start so from 'a capacity of 250 days' to 'a capacity of 250 days per channel'  This would make it consistent with other wording in the document that specifies per channel.
Honeywell	✗	CoP 5 reviewed, this refers to registers in 4.1.2, should it have been 4.2.2?
Siemens Managed Applications & Services	✓	The redlining is in line with the proposed CP1527 solution, however as outlined above we do not believe that the proposed solution addresses all the questions that this Consultation raises.
Npower	-	
Stark	✓	
SMS Energy Services Ltd	✓	We agree that the redlining delivers the proposed solution
TMA Data Management Ltd	✓	
EDF	-	
SSE Energy Supply Limited	✓	

## Question 3: Will CP1527 impact your organisation?

### Summary

Yes	No	Neutral/No Comment	Other
6	3	1	0

### Responses

Respondent	Response	Rationale
Association of Meter Operators	✗	
IMServ	✓	<p>As a DC we would be able to collect more data than we currently do for site visits and on connections where access takes a long time to arrange.</p> <p>As a MOP we would have to change our meter programming and potentially stop using some of our metering as it would not be capable of being compliant with the new rules.</p>
Honeywell	✓	Honeywell will no longer be able to supply product to this segment. Given Honeywell are the largest supply to this segment and there are no other tested and proven meters to meet the new requirements this will introduce a risk to the market.
Siemens Managed Applications & Services	✓	<p>As of now we cannot fully assess the impact because we believe more detail is required, but it is likely to include the training of Field MO engineers, both CVA and SVA, in the requirements of new / modified meter models, supporting documentation and potentially the amendment of supporting systems.</p> <p>As HHDC, would BSCP601 protocol approval be required on existing meter models if they were reconfigured to 15 minutes ISP? If so, this will involve additional work for us.</p>
Npower	✓	As referenced in question 1, our data can be dialled back to a minimum of 90 days. Changes would be required to move beyond 90 days.
Stark	✗	This CP mainly impacted on MOP Party Agent so no direct impact on DC/DA.
SMS Energy Services Ltd	✓	There will be some impact to ensure that the meters that we stock and install comply with the proposal.
TMA Data Management Ltd	✗	The capacity of meters to change the integration period duration does not impact our systems or



Respondent	Response	Rationale
		procedures but the change of integration period duration would impact our systems and procedures.
EDF	-	
SSE Energy Supply Limited	✓	The change should have a positive impact on settlement performance at later settlement runs (ie RF) as more data will be available to extract from the meter in sites that have experienced long term dialling issues. This will also improve accuracy of billing for half hourly metered customers following long term dialling issues.

## Question 4: Will your organisation incur any costs in implementing CP1527?

### Summary

Yes	No	Neutral/No Comment	Other
5	3	2	0

### Responses

Respondent	Response	Rationale
Association of Meter Operators	✗	
IMServ	✓	DC costs will not change appreciably, although there could be a possibility that the site visit agents finish less jobs as they're on site longer.  MOP costs will need to be evaluated as we look to replace the meter types in our portfolio for new installs with ones compatible with this requirement, additionally we will need to change the settings on all our programming software to ensure that any meters programmed or reprogrammed in the period comply with the requirements where possible.
Honeywell	-	
Siemens Managed Applications & Services	✓	We are unable to quantify the costs as there is not enough detailed information available; however there will be costs associated with the reply to Question 3, the replacement of meters that cannot be reconfigured to a different ISP and the write-off of any existing unused meter stock (one-off cost).
Npower	✓	We would expect to incur costs if the solution progressed as is. A more detailed impact assessment will be conducted at a later date.
Stark	✗	
SMS Energy Services Ltd	✓	There will be some costs to ensure that the meters that we stock and install comply with the proposal in time for the implementation date.
TMA Data Management Ltd	✗	
EDF	-	
SSE Energy Supply Limited	✓	There may be increased cost associated with AMR/HH meter installations due to upgrades to meet the new specifications.

## Question 5: Do you agree with the proposed implementation approach for CP1527?

### Summary

Yes	No	Neutral/No Comment	Other
7	2	1	0

### Responses

Respondent	Response	Rationale
Association of Meter Operators	✓	
IMServ	✓	The proposed changes will deliver the proposers' requirements
Honeywell	✗	If this is approved then it should have an implementation date of June 2022, to allow the modifications to products, introduction of new test specifications and appropriate new approvals to new tests to be completed.
Siemens Managed Applications & Services	✗	Due to the questions that we have raised in this response we feel unable to support the proposed Implementation Date of 24/06/2021
Npower	✓	We support the proposed implementation date but are not supportive of the proposed solution at this point in time.
Stark	✓	
SMS Energy Services Ltd	✓	We agree with the implementation approach but we think the timescales should consider not only the time for meter manufacturers to make compatible meters but also for agents to source the meters for installation.
TMA Data Management Ltd	✓	
EDF	-	
SSE Energy Supply Limited	✓	We support the approach to include this change in the June 2021 BSC release.

## Question 6: Do you have any further comments on CP1527?

### Summary

Yes	No
5	5

### Responses

Respondent	Response	Comments
Association of Meter Operators	✓	<p>The discussion in the Issue 80 group considered a number of potential impacts. The benefit of making the change is to improve the resilience of data storage with the Outstations to reduce the Settlement risk of missing data. The cost of the additional data storage in new and replacement metering Outstations should be trivial in the scale of lost data.</p>
IMServ	✓	<p>While we have agreed with the proposed changes, it is necessary to ask the question about integration periods smaller than 15 minutes.</p> <p>As part of the rationale is to ensure there is enough data in the meter to support the new MHHS window at 15 minutes, should clarification be added to mandate that metering that supports smaller integration periods, for whatever bespoke requirements there are, still has 125 days capacity per channel to ensure settlement coverage?</p> <p>Risk factors for consideration:</p> <ul style="list-style-type: none"> <li>• Meter manufacturers don't step-up and this limits the number of suitable products on the market it could affect MOPs ability to install new/replace existing HH meters after 24 June 2021. <ul style="list-style-type: none"> <li>o *** The lead time for ordering meters can be long i.e. &gt; 3months</li> <li>o *** Some Manufacturers appear to have taken their foot off the gas in respect to COP5/COP10 meters, probably too busy making SMETS meters</li> <li>o *** Dare I say it, a certain global virus has likely impacted meter manufacturing in Asia, hopefully not an ongoing issue.</li> </ul> </li> <li>• If after 24 June 2021 a MOP has existing stock which doesn't meet the 250 day per Channel requirement, I expect MOPs to carry on and fit the equipment until the stock has been excused.</li> </ul>

Respondent	Response	Comments
		<p>Scraping the and stock and dumping it in landfill is unacceptable form a financial and environmental position.</p> <ul style="list-style-type: none"> <li>For some Manufacturers products MOPs will be able to meet the 250 day per Channel requirement, but only if they reduce the number of channels programed.</li> </ul> <p>Possibly we might see some industry standard 6 channel meters reduce to 1, 2, 3 or 4 channels, this could mean MOPs comply with the '250' days but don't comply with other CoP channel requirements.</p> <p>o *** NB - Most MOPs programme 6 channels into CoP3/CoP5 meters, however the COPs only require 5 channels, MOPs add both AI &amp; AE even when there's no export capability on-site.</p> <ul style="list-style-type: none"> <li>Audit stuff...</li> </ul> <p>Wil Elexon look to audit MOPs for the 250 day per Channel requirement?</p> <p>If so, who will have the job i.e. Elexon or TAA?</p> <p>How will they go about it i.e. look at profile data in meters (read all back)? Or compare the make model with manufactures Tech sheet?</p> <p>Possibly Elexon could/should publish the meters storage capabilities by make/model on the list of approved Outstations type document?</p>
Honeywell	✓	<p>If an increase to data storage is to be considered, then 93 days of 30mins data would be more appropriate. This would / should ensure any sites with poor access can be reached before wrap around.</p> <p>It appears that this proposal is trying to address a problem that does not exist, as very rarely data is lost even with a 10 or 20 day storage, therefore an increase to 93days should be more than sufficient.</p>
Siemens Managed Applications & Services	✓	<p>The comment in the Consultation report, that the Issue 80 Group "noted that the Imbalance Settlement Period (ISP) is changing to 15 minutes as part of the Clean Energy Package. This is required for implementation by 1 January 2021" has given rise to concerns around the timescales involved. This has influenced our response. We assume that it will not be happening in practice and</p>

Respondent	Response	Comments
		<p>that because of the timescale Ofgem will grant an exemption from implementation or a derogation.</p> <p>The transition from a 30 minute ISP to 15 minute ISP has to be very carefully planned and co-ordinated for both CVA and SVA. Failure to do so will potentially lead to a significant Risk to Settlement. As a HHDC we are aware that significant system changes would have to be made to cater for 15 ISP, which could include Role Re-Qualification under BSCP537. Doubling the volume of data could also result in processing issues due to extended data collection times and volumes.</p> <p>As it is difficult to envisage a situation where it would be possible for new metering to operate on 15 minute periods and legacy meters would remain on 30 minute demands, it would have to be all of one or the other. Which would imply a big bang transition from one to the other.</p> <p>We expect that any proposed transition of ISP will be subject to full and detailed Industry engagement and consultation which would need to extend well beyond the proposed transition date of Jan 1 2021. For the BSC alone this will involve Issue groups, Modification and Change Proposals. There will also be other Codes to be considered.</p> <p>With regards to existing meter models, for CVA use, the Cewe ProR/W would still be suitable. However, for SVA where it would be recording 6 metered quantities per ISP, the Cewe meter does not have the capacity for the proposed storage duration of 250 days. This means that the only meters currently approved for CVA/SVA (CoP1 &amp; 2) use would be the L+G ZMQ and the Ion 8800.</p>
Npower	✓	We would be happy to discuss our comments further if required.
Stark	✗	
SMS Energy Services Ltd	✗	
TMA Data Management Ltd	✗	
EDF	✗	
SSE Energy Supply Limited	✗	

