

CP Consultation Responses



CP1508 'Updating references to the British and International Standards within the relevant Code Subsidiary Documents'

This CP Consultation was issued on 10 September 2018 as part of CPC00789, with responses invited by 5 October 2018.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Association of Meter Operators	1	MOAs
npower	7	Supplier, MOA, HHDC, HHDA, NHHDC, NHHDA
ScottishPower	1	Supplier, MOA, HHDC, HHDA, NHHDC, NHHDA
SP Distribution SP Manweb	2	Distributors
SSE Electricity Limited	3	Supplier, MOA
TMA Data Management Limited	1	HHDC, HHDA, NHHDC, NHHDA

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
Association of Meter Operators	-	x	x	x
npower	✓	x	x	✓
ScottishPower	✓	✓	✓	✓
SP Distribution SP Manweb	✓	✓	✓	✓
SSE Electricity Limited	✓	✓	✓	✓
TMA Data Management Limited	✓	x	x	✓

Question 1: Will the implementation of CP1508 leave your organisation with stranded assets that cannot be installed compliantly?

Summary

Yes	No	Neutral/No Comment	Other
3	2	1	

Responses

Respondent	Response	Rationale
Association of Meter Operators	No	
npower	No	<p>We do not operate a Meter Asset Provision (MAP) service and do not store assets that are not compliant with the revised safety provisions and therefore do not believe the proposed change will impact us directly.</p> <p>However, we have not received a view on this question from the external MAPs that we interact with so there may be a risk of stranded assets. On this basis, and pending the views of other industry stakeholders, we would be supportive of a generic Metering Dispensation to support transitioning assets as the safety references are updated.</p>
ScottishPower	Yes	Yes, we would have assets that have been purchased that would no longer be compliant, therefore we could not install. We would fully support a temporary generic Metering Dispensation.
SP Distribution SP Manweb	Yes	We are not aware of any assets at this point that would fall into an area of non-compliance, but other than carrying out a full physical audit on all equipment in all areas of the business, we would not at this point be able to state with 100% confidence that there would be no stranded assets.
SSE Electricity Limited	Yes	There is a risk that there may be metering equipment stamped under older standards in our supply chain. However, a Metering Dispensation could allow for these to still be installed compliantly.
TMA Data Management Limited	n/a	As Data Collector and Aggregator, TMA does not have any metering asset.

Question 2: Do you agree with the CP1508 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
5		1	

Responses

Respondent	Response	Rationale
Association of Meter Operators	No Comment	
npower	Yes	It is correct that safety references within the BSC are updated.
ScottishPower	Yes	Yes, we agree the proposal is a logical approach.
SP Distribution SP Manweb	Yes	We agree that there should be one source of technical references for simplicity within the Industry. However we believe that the implementation of a temporary generic Metering Dispensation would be appropriate at this time.
SSE Electricity Limited	Yes	It makes sense to update the standards in the Code Subsidiary Documents (CSDs) to align them with the current applicable standards. We note that similar updates will need to be made again in future because the current standards will change. It may therefore be helpful for ELEXON to formally schedule regular review of the standards within the CSDs so that impacted Parties or non-Parties may better understand when similar BSC changes to the standards are likely to be made.
TMA Data Management Limited	Yes	

Question 3: Do you agree that the draft redlining delivers the CP1508 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
6			

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	Yes	
npower	Yes	
ScottishPower	Yes	We agree with the CP1508 proposed solution.
SP Distribution SP Manweb	Yes	
SSE Electricity Limited	Yes	
TMA Data Management Limited	Yes	

Question 4: Will CP1508 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
3	3		

Responses

Respondent	Response	Rationale
Association of Meter Operators	No	
npower	No	As per response to question 1, this will not impact us directly; however a view from MAP organisations would be helpful.
ScottishPower	Yes	Prior to implementation, we would have to update any control documents (where applicable) to ensure that the updated references to the British and International standards are shown.
SP Distribution SP Manweb	Yes	<p>A number of document reviews will be required to ensure that the appropriate alignment of engineering specifications has taken place.</p> <p>A full audit of equipment and assessment of use – there may be equipment that has been approved for install on a previous Standard that is not a commonplace installation; there may be no certainty on when this equipment may be required for installation.</p> <p>One further consideration may be the use of used/refurbished equipment for strategic spares to ensure that this complies if used in any capacity on the network.</p>
SSE Electricity Limited	Yes	There may be metering equipment stamped under older standards in our supply chain. As Supplier and as MOA we could be impacted by the potential sunk cost of such equipment.
TMA Data Management Limited	No	

Question 5: Will your organisation incur any costs in implementing CP1508?

Summary

Yes	No	Neutral/No Comment	Other
3	3		

Responses

Respondent	Response	Rationale
Association of Meter Operators	No	
npower	No	
Scottish Power	Yes	We will not incur any additional cost initially, though some older meters and Current Transformers (CT's) may now no longer be re-issued if they do not meet the new standards.
SP Distribution SP Manweb	Yes	We are unable at this point to quantify costs for this. We would anticipate an insignificant cost for the process administration aspect, however should potential stranded assets be identified, these would require individual assessment.
SSE Electricity Limited	Yes	There may be costs associated with management of metering stock (e.g. removal/disposal of stock equipment that is no longer compliant if stamped to older standards, and subsequent potential to require purchase of replacement stock), should an option for a Metering Dispensation not be available.
TMA Data Management Limited	No	

Question 6: Do you agree with the proposed implementation approach for CP1508?

Summary

Yes	No	Neutral/No Comment	Other
5	1		

Responses

Respondent	Response	Rationale
Association of Meter Operators	No	As noted in the CP the CoP6, 7, 8 & 9 are not being updated by this CP. As a result, these CoPs continue to be misleading and erroneous. Whilst agreeing that there is no need to update these CoPs as they are redundant, the BSC should recognise these CoPs are redundant by withdrawing them. A separate CP should be raised to withdraw from use CoPs 6, 7, 8 & 9.
npower	Yes	Pending any further information from MAPs.
Scottish Power	Yes	We agree with the approach set out in CP1508.
SP Distribution SP Manweb	Yes	We agree with the implementation approach on the basis of a temporary generic Metering Dispensation being implemented prior to this, in order to protect parties in the event of stranded assets being identified.
SSE Electricity Limited	Yes	We agree that the implementation date of 27 June 2019 is appropriate, if a Metering Dispensation is also raised to allow for installation of equipment stamped to older standards for those Parties/ Party Agents that may require it.
TMA Data Management Limited	Yes	

CoP1

Respondent	Location	Comment

CoP2

Respondent	Location	Comment

CoP3

Respondent	Location	Comment

CoP4

Respondent	Location	Comment
Association of Meter Operators	References and Section 6 footnote 8	Statutory Instruments 2006 No. 1153 is not the correct reference; it should be Measuring Instruments Regulations 2016 (SI 2016/1153).

CoP5

Respondent	Location	Comment

CoP10

Respondent	Location	Comment
Association of Meter Operators	References and Section 5.5	Statutory Instruments 2006 No. 1153 is not the correct reference; it should be Measuring Instruments Regulations 2016 (SI 2016/1153).

BSCP601

Respondent	Location	Comment