

## CP Consultation Responses

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### CP1566 'Introducing the CVA Commissioning End to End Check (CEEC) process'

This CP Consultation was issued on 11 July 2022 as part of the November 2022 CPC Batch, with responses invited by 5 August 2022.

#### Consultation Respondents

| Respondent                     | No. of Parties/Non-Parties Represented | Role(s) Represented |
|--------------------------------|--|---------------------|
| UK Power Networks              | 1                                      | Distributor         |
| Siemens                        | 1                                      | Supplier Agent      |
| Electricity North West Limited | 1                                      | Distributor         |
| Scottish Power                 | 2                                      | Supplier Agent, MEM |
| SMS Plc                        | 1                                      | Supplier Agent      |

## Summary of Consultation Responses

| Respondent                     | Agree? | Impacted? | Costs? | Impl. Date? |
|--------------------------------|--------|-----------|--------|-------------|
| UK Power Network               | ✓      | ✓         | ✓      | ✗           |
| Siemens                        | ✓      | ✓         | ✓      | ✓           |
| Electricity North West Limited | ✓      | ✓         | ✓      | ✗           |
| Scottish Power                 | ✓      | ✗         | -      | ✓           |
| SMS Plc                        | ✓      | ✓         | ✗      | ✓           |

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CP1566

CP Consultation  
Responses

---

8 August 2022

---

Version 1.0

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Page 2 of 22

---

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## Question 1: Do you agree with the CP1566 proposed solution?

### Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 4   | 0  | 1                  | 0     |

### Responses

| Respondent        | Response | Rationale  |
|-------------------|----------|--|
| UK Power Networks | Yes      | <p>We welcome this CP is part of a wider scope of industry work to improve industry CVA compliance including; Elexon's "Collaborating to Ensure Settlement Accuracy" workshops and the progression of issue "Meter Registrants and Settlement Risk – A New Way", raised by the DNOs.</p> <p>UK Power Networks is fully supportive of the application of an effective Commissioning End to End Check (CEEC) solution within the overall performance assurance framework to help mitigate risks to inaccuracy in Settlements, and particularly those associated with Risk '020' listed in the PAB252 "Risk Evaluation Register 2022-23" but do have some concerns regarding the proposed detail set out in this CPC.</p> <p>Within the 'Proposal' sections (ii) and (iii) and with regards to the 'Registrant' role, we can see that there is a high probability of flagging potential issues where metered volume profiles are reasonably consistent, however, we would like to better understand best practice and techniques of conducting such a test on circuits that are not consistent in volume or direction:</p> <ul style="list-style-type: none"><li>• sites that are located in generation dominated areas, particularly those that swing back and forth within the half hour;</li></ul> |

CP1566

CP Consultation Responses

8 August 2022

Version 1.0

Page 3 of 22

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|                                |     |  |
|--------------------------------|-----|--|
|                                |     | <ul style="list-style-type: none"> <li>• sites with high levels of ‘normal’ volatility within a half hour – settlement metering correctly integrates demands across the half hour to produce a MWh value; however, SCADA typically takes instantaneous readings at short intervals (as is needed for network control) which must then be ‘averaged’ in some way to get a half hourly value and can give a different answer to the settlement readings.</li> </ul> <p>We agree that SCADA data acquisition and its use [Section (iii)] could be useful for the validation of ‘whole site’ and/or SGT Circuit’ volumes verification. We view this as being most effective where SCADA data is available at SGT circuit level and ideally having MW and MVar measurement quantities for import and export. We believe this would be the nearest to a like-for-like comparator with the accumulative BSC MWh for Active Import, Active Export, Reactive Import and Reactive Export as would be provided by the CDCA for post-proving.</p> <p>Further consideration may be required for the situations detailed below:</p> <ul style="list-style-type: none"> <li>• measurement quantities with SCADA metering can vary from site to site (some circuits only records Volts and Amps) so if we are asked to verify volumes against BSC measurement quantities AI, AE, RI, and RE we would not be able to provide verification against these measures in all cases.</li> <li>• where there is a requirement to verify data for SGT circuit volumes and where SCADA data is not available at this level, then alternatively SCADA output-feeder metering could be used but this is a proxy where the useful value of the data can be unreliable.</li> </ul> |
| Siemens                        | Yes | End to end commissioning checks should reduce rare CVA commissioning errors  |
| Electricity North West Limited | Yes | <p>We are supportive that the proposed solution places clearer objectives on the Registrant for the CVA sites to provide the Commissioning end to end check (CEEC). This is consistent with the principles in the SVA market and across the BSC and we support these principles.</p> <p>We are however, concerned that there are a number of practical issues which have been discussed with the BSC PAB relating to the nominated registrant at</p>   |

|                |         |   |
|----------------|---------|---|
|                |         | <p>some of the Grid Supply Point (GSP) sites. Whilst the nominated registrant is reported and recorded as the DNO, the party responsible for the site and has the contractual arrangements for the CVA meter operator, is National Grid Electricity Transmission (NGET) This is a function of the historical arrangements rather than a specific implementation issue. We would suggest that the ISG and SVG should align the discussions surrounding this CP with those being held on the wider CVA investigations into potential Annual Demand Ratio (ADR) issues. As Registrant of GSP CVA meter systems DNOs are proactively engaging and working with Elexon to facilitate their analysis and investigation of potential ADR issues in GSP Groups; such as participating in 'Collaborating to Ensure Settlement Accuracy' Elexon meetings and raising a DNO sponsored BSC issue (which has not yet had a number allocated by Elexon) to ensure the barriers with the current BSC processes and current issues are given due consideration and addressed.</p> |
| Scottish Power | Yes     | None provided.  |
| SMS Plc        | Neutral | <p>We agree that this solution will help long term settlement losses become short term settlement losses but do not believe it is a solution to the problem that has caused the recent losses.</p> <p>The CEEC is not solving the ultimate problem. As stated in "CP1566 'Introducing the CVA Commissioning End to End Check" (expanded in our response to Question 8).</p>   |

## Question 2: Do you agree that the draft redlining delivers the CP1566 proposed solution?

### Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 5   | 0  | 0                  | 0     |

### Responses

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

| Respondent        | Response | Rationale  |
|-------------------|----------|--|
| UK Power Networks | Yes      | <p>In our opinion the draft redlining delivers the CP1566 proposed solution. However, we pick out two points in particular:</p> <ul style="list-style-type: none"> <li>BSCP20: Form BSCP20/4.3a includes a box for the Registrant to indicate a CEEC is required. However, this form is submitted as per Section 3.1.1 at WD-20 and falls before the MOA identifies whether a CEEC is required under Section 3.1.9 at WD-16. This creates a conflict. There will be clear situations where a Registrant will be able to identify a CEEC is required (e.g. a new GSP!) but since the onus is on the MOA there may situations where the Registrant does not tick this box, but the MOA flags the requirements for a CEEC. This should not lead to a situation where a Registrant is deemed to have submitted a non-compliant 4.3a.</li> <li>BSCP02: Page 8, para (2) – We suggest that the Registrant should be required to explain to the CDCA why the para 1 test method is 'not practically possible'.</li> </ul> |

CP1566

CP Consultation Responses

8 August 2022

Version 1.0

Page 6 of 22

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|                                |     |   |
|--------------------------------|-----|---|
| Siemens                        | Yes | None provided                               |
| Electricity North West Limited | Yes | We have not identified any specific issues. |
| Scottish Power                 | Yes | None provided.                              |
| SMS Plc                        | Yes | None provided.                              |

## Question 3: Will CP1566 impact your organisation?

### Summary

| High | Medium | Low | None |
|------|--------|-----|------|
| 0    | 2      | 2   | 0    |

### Responses

| Respondent        | Response     | Rationale   |
|-------------------|--------------|---|
| UK Power Networks | Yes – Medium | <p>We would expect to:</p> <ul style="list-style-type: none"><li>• Utilise additional Registration Analyst resource to undertake the check process.</li><li>• Call on additional resource from the Outage Planning team to provide technical input of the network switching/flow status for the settlement period being checked.</li><li>• Additional contract management/relationship resource to engage with National Grid (SO and TO) and MOAs as necessary.</li><li>• Enhancements to current reporting and data acquisition.</li></ul> |
| Siemens           | Yes – Medium | CVA MOA process changes / amendments. Possible support to CVA Registrants TBD.  |

|                                |           |  |
|--------------------------------|-----------|--|
| Electricity North West Limited | Yes – Low | ENWL is the recorded registrant of a number CVA sites. The majority of these sites are Grid Supply Points (see our response to Question 1) where National Grid manage the sites. We also have a small number of sites where we are the registrant and manage the arrangements on site. We will need to work with our CVA meter operator to understand the implications of this change. |
| SMS Plc                        | Yes – Low | As CVA MOA we will be required to add an additional step into our post metering activity process.  |

## Question 4: Will your organisation incur any costs in implementing CP1566?

### Summary

| High | Medium | Low | None |
|------|--------|-----|------|
| 0    | 1      | 2   | 2    |

### Responses

| Respondent                     | Response | Rationale  |
|--------------------------------|----------|--|
| UK Power Networks              | Medium   | Confidential   |
| Siemens                        | Low      | Process changes and implementation of revised processes.   |
| Electricity North West Limited | Low      | ENWL is the recorded registrant of a number CVA sites. The majority of these sites are Grid Supply Points (see our response to Question 1) where National Grid manage the sites. We also have a small number of sites where we are the registrant and manage the arrangements on site. We will need to work with our CVA meter operator to understand the implications of this change. |
| Scottish Power                 | None     | None 4provided.  |
| SMS Plc                        | None     | None provided.   |

## Question 5: Do you agree with the proposed implementation approach for CP1566?

### Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 3   | 2  | 0                  | 0     |

### Responses

| Respondent                     | Response | Rationale   |
|--------------------------------|----------|---|
| UK Power Networks              | No       | Whilst we understand the need for prompt implementation of this CP, November 2022 is very tight. Our preference would be for its inclusion in the standard February 2023 BSC Release. This would also permit some of the work to come under 'Meter Registrants and Settlement Risk' – A New Way' to be considered in conjunction with CP1566. |
| Siemens                        | Yes      | None provided.  |
| Electricity North West Limited | No       | As noted in Question 1, DNOs have raised a BSC Issue. DNOs would welcome review of Registrants obligations under the BSC and recommend this review focuses on the following three key areas which DNOs believe are constraining the successful monitoring of GSP CVA metering systems:  |

CP1566

CP Consultation  
Responses

8 August 2022

Version 1.0

Page 11 of 22

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|  |   |
|--|---|
|  | <ul style="list-style-type: none"> <li>• Operational Responsibility of CVA Metering System Registrants constraints – DNOs who are the named Registrants do not have the commercial operational ability to influence the Meter Operator nor have visibility of underlying metering technical constraints or errors taking place in terms of connections. This is the result of NGET largely retaining operational control and management of the GSP connection points. The recent Elexon press release states “We are reminding Registrants that they must ensure that their meters record accurate and complete data. They must also notify us and other market participants if they notice potential errors. BSC section L, sub-section 2 explains these responsibilities.” In certain scenarios we wouldn’t be in a position to be able to notice as we don’t have the visibility or influence on the MOP. Is the current allocation of BSC obligations requiring DNOs to Registrants still relevant in the current and future energy markets and is it still fit for purpose?</li> <br/> <li>• Legacy calculation methodology constraints Are the current calculation methodologies for ADR and LLF still fit for purpose with increased embedded generation. The industry must also consider the SVA impacts on the ADR calculation (which is the responsibility of other Registrants).</li> <br/> <li>• New embedded generator connections commercial constraints. Is the BSC obligations blind on scenarios whereby the NGET is making a new connection directly with an embedded generator? Should the NGET contractual arrangements with the embedded generator be codified to ensure COP 4 processes should be correctly followed? There should be checks in place after the commissioning process.</li> </ul> |
|--|---|

|                |     |   |
|----------------|-----|---|
|                |     | We would suggest that a whole solution should be implemented rather than implement changes on an iterative basis. The proposed implementation date of November 2022 for this CP will not allow sufficient time for the whole solution to be identified. |
| Scottish Power | Yes | None provided.  |
| SMS Plc        | Yes | None provided.  |

**Question 6: Should the timeframe, before an escalation is raised, be reduced from three months to one week?.**

**Summary**

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 2   | 2  | 0                  | 0     |

**Responses**

| Respondent                     | Response | Rationale   |
|--------------------------------|----------|---|
| UK Power Networks              | No       | Whilst we consider that the proposed approach has the potential to backstop the resolution of potential metering issues this must be balanced against situations where circuits are not energised as planned for other reasons. In this case one week is unreasonably short. We could support a shorter timeframe of say 6-8 weeks as this would maintain a Party's focus and prioritisation. |
| Siemens                        | Yes      | Escalation timeframe change from 3 months to 1 month seems reasonable.  |
| Electricity North West Limited | No       | We agree that the CDCA should escalate any issues but the proposed move from three months to one week is a significant reduction in timescales without justification. The proposed one week timeframe may not allow registrants sufficient time to organize   |

|         |     |   |
|---------|-----|---|
|         |     | <p>the investigation and report back to the CDCA.</p> <p>The ISG and SVG could consider a point in between the two dates which may be more proportionate (e.g. 4-6 weeks)</p> |
| SMS Plc | Yes | <p>If the idea of this change proposal is to reduce settlement losses, then yes, we see no reason to wait for three months before raising an escalation.</p>                  |

**Question 7: Do you agree that the number of attempts in escalation process outlined in the CDCA Service Agreement should be reduced from three (3) to one (1) attempt?**

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## Summary

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| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 1   | 3  | 0                  | 0     |

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## Responses

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| Respondent                     | Response | Rationale   |
|--------------------------------|----------|---|
| UK Power Networks              | No       | We believe that two attempts are appropriate, one request, one reminder, say two weeks later, then escalation after a further two weeks   |
| Siemens                        | No       | 3 attempts to escalate seems appropriate  |
| Electricity North West Limited | No       | The proposal to change the number of escalations from three to one has not identified any reason as to why this would have a beneficial impact on the process.<br>Elexon should balance the need to resolve the issue with the practicalities of instigating the commissioning process. |
| SMS Plc                        | Yes      | We feel that as the issues have caused the losses they have, then not reducing this would add extra time.   |

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CP1566

CP Consultation  
Responses

---

8 August 2022

---

Version 1.0

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Page 17 of 22

---

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## Question 8: Do you have any further comments on CP1566?

### Summary

| Yes | No |
|-----|----|
| 2   | 3  |

### Responses

| Respondent        | Response | Comments   |
|-------------------|----------|--|
| UK Power Networks | Yes      | <ol style="list-style-type: none"><li>1. Is there any expectation surrounding CEEC related process timings/estimated timings? For example, a list of time windows determining the pace of the process beyond those already prescribed by the BSC?</li><li>2. Although revisiting existing BSC content and Registrant obligations via the MOA and beyond looking for accreditation, process compatibility, and contractual control i.e., effective collaborative working are there any other checks that could be reasonable be expected of the registrant?</li><li>3. Are the Contractual/arrangements</li></ol> |

|                                |     |  |
|--------------------------------|-----|--|
|                                |     | associated with Network operator and not necessarily registrant obligation: For example, the provision and commissioning of VTs and CTs, to be regarded as part of the CEEC?   |
| Siemens                        | No  | None provided.   |
| Electricity North West Limited | No  | None provided.   |
| Scottish Power                 | No  | None provided.   |
| SMS Plc                        | Yes | <p>The CEEC is an addition to our processes but does not really impact us as the MOA we can understand the thinking with this, but we would question whether it mitigates the risk to settlements.</p> <p>What really needs to be looked at is that the providers and installers of the measurement transformers are regulated and required to test and evidence that the equipment they have provided is working correctly. Particularly in response to the statement in “CP1566 ‘Introducing the CVA Commissioning End to End Check” were it states that “it is often impossible for the CVA MOA to gain visibility of all the items of Metering Equipment to confirm commissioning has been completed correctly, as they can be installed and commissioned by different parties and can be done at different times.”</p> <p>We feel that some of the changes are a little vague; there needs to be more urgency and processes need to be followed. To really get to the bottom of the issue responsible parties need to be told what they should be doing and not, it could be this party or the other. Also, there is too much use of the phrase “this may be required” is it required, or isn’t it?</p> |

|  |  |  |
|--|--|--|
|  |  | <p>We are also not confident it really covers all eventualities for example with a communications fault which will not necessarily affect settlements does a CEEC need to be done; the CP indicates when any work is undertaken on a metering system and CEEC should be completed. This could be excessive and again is an example of how we need to be more specific and forceful with the changes that are made.</p> |
|--|--|--|

**BSCP02**

| Respondent       | Location                 | Comment   |
|------------------|--------------------------|---|
| UK Power Network | Amendment Record table   | 8.1 version reference different to the 8.5 previously quoted  |
| UK Power Network | Section (1.1) para (3,4) | When referencing fig1, should there be demarcation between the VTs and CTs which form part of a network operator (TO or DNO) obligations, as separate assets to the metering? |
| UK Power Network | Page (8), para (2)       | The Registrant should be required to explain to the CDCA why the para 1 test method is 'not practically possible'   |

**BSCP20**

| Respondent        | Location                | Comment  |
|-------------------|-------------------------|--|
| UK Power Networks | Section 3 and form 4.3a | <p>Form BSCP20/4.3a includes a box for the Registrant to indicate a CEEC is required. However, this form is submitted as per Section 3.1.1 at WD-20 and falls before the MOA identifies whether a CEEC is required under Section 3.1.9 at WD-16.</p> <p>This creates a conflict.</p> <p>There will be clear situations where a Registrant will be able to identify a CEEC is required (e.g., a new GSP!) but since the onus is on the MOA there may situations where the Registrant does not tick this box, but the MOA flags the requirements for a CEEC.</p> |

|  |  |  |
|--|--|--|
|  |  | This should not lead to a situation where a Registrant is deemed to have submitted a non-compliant 4.3a. |
|--|--|--|