

CP Consultation Responses

CP1563 'Altering the Trigger Point for CT Commissioning'

This CP Consultation was issued on 11 April 2022 as part of the April 2022 CPC Batch, with responses invited by 6 May 2022.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Scottish Power	2	Supplier, Metering Equipment Manager (MEM)
The Electricity Network Company Ltd (ETCL)	1	Distributor
Northern Power Grid	1	Distributor
IMServ	1	Metering Equipment Manager
Western Power Distribution	1	Distributor
UKPN	1	Distributor

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
Scottish Power	✓	✓	✗	✓
The Electricity Network Company Ltd (ETCL)	✓	✓	✗	✓
Northern Power Grid	✓	✓	✗	✓
IMServ	✓	✓	✓	✓
Western Power Distribution	✓	✓	✓	✓
UK Power Networks	✓	✓	✗	✓

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Question 1: Do you agree with the CP1563 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
6	0	0	0

Responses

Respondent	Response	Rationale
Scottish Power	Yes	N/A
The Electricity Network Company Ltd (ETCL)	Yes	<p>We agree with the proposed solution. Using energisation as the trigger for sending of commissioning information as opposed to commissioning itself is more practical, particularly when dealing with pre-commissioned units & other CT metering described in the Proposal Form.</p> <p>We would request clarification that the new timelines apply to energisation of supply & not physical energisation of the cut out. Using energisation of supply as the trigger resolves issues sending D0383s where a Supplier/Meter Agent has not yet been registered.</p> <p>We would also request that the legal text is sufficiently clear to clarify that a D0139 is to act as trigger point (where Meter Agent energises) for sending of a D0383 only in the first instance of energisation (appreciating subsequent D0139s may be received to which we would not expect to be required to send a D0383 where there is no change to the CTs installed by the LDSO).</p>
Northern Power Grid	Yes	As proposer, we support the solution.
IMServ	Yes	<p>We recognise the documented scenarios which are causing issues for LDSOs and accept that the proposed changes will improve these situations.</p> <p>Because the overall timescales are not changing there is minimal impact to the</p>

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		process, we suspect that LDSOs are already operating in line with CP1563 so the change is simply reflecting what happens today in real world scenarios.
Western Power Distribution	Yes	N/A
UK Power Networks	Yes	<p>UK Power networks agree with this change because currently the LDSO is not aware of the Energisation date of low voltage (LV) CT operated fused supply at the time of Energisation. This is due to the MOA receiving instructions from the supplier to Energise and insert the fuses, the LDSO is not part of this process and hence does not have visibility of when it has been energized.</p> <p>For all other voltages including LV Boards and LV Air Circuit Breaker, High Voltage (HV) and Extra High Voltage (EHV), the supplier informs to LDSO when to Energise independently from the MOA. Therefore, there is a risk of the MOA having the numbers of days to commission reduced.</p>

Question 2: Do you agree that the draft redlining delivers the CP1563 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
5	1	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
Scottish Power	Yes	N/A
The Electricity Network Company Ltd (ETCL)	Yes	Yes, providing the comments in Question 1 response regarding energisation type & D0139 triggers is sufficiently clear in the baselined text.
Northern Power Grid	Yes	N/A
IMServ	Yes	N/A
Western Power Distribution	Yes	N/A
UK Power Networks	No	As per the change proposal from Northern Power Grid the date of action should be the trigger point for the LDSO which equates to when the CT's have been energized.

Question 3: Will CP1563 impact your organisation?

Summary

High	Medium	Low	None
0	1	4	1

Responses

Respondent	Response	Rationale
Scottish Power	None	N/A
The Electricity Network Company Ltd (ETCL)	Low	The change will positively impact us as it provides a more logical & consistent process for the sending of commissioning information. We agree that the current BSCP SLAs are not fit for purpose.
Northern Power Grid	Low	It will require amendments to internal procedures. As stated in the CP consultation, the solution will help reduce the risk of BSCP/REC non-compliance.
IMServ	Low	<p>Our current software manages/monitors the commissioning process based on the energisation date, rather than the date we send the D0139. However as the over-all timescales are not changing we suspect the end result will be unchanged.</p> <p>One minor point for us to consider is that if on HH CT install the MEM is late in sending the new MTDs with accompanying D0139, the LDSO will consider their clock to have started ticking on receipt of this late D0139. The MEM may then chase the LDSO (automated process) for the D0383 based on the energisation date, which would be early in LDSO's eyes.</p>
Western Power Distribution	Medium	Process and documentation changes will be required. Systems will require to be checked to align the amended trigger points to any system alerts.

UK Power Networks	Low	Changes will be required to internal reporting and processes updated to ensure there is clear visibility of performance against the new trigger point.
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Question 4: Will your organisation incur any costs in implementing CP1563?

Summary

High	Medium	Low	None
0	0	2	4

Responses

Respondent	Response	Rationale
Scottish Power	None	N/A
The Electricity Network Company Ltd (ETCL)	None	N/A
Northern Power Grid	None	Other than the obvious resource time amending procedures.
IMServ	Low	Ideally we won't need to make any system changes to accommodate CP1563, further analysis is required, but we are not anticipating any changes.
Western Power Distribution	Low	Costs will be incurred for the process and document changes and any possible system alerts that will need amending, however, it is anticipated that these costs will be minimal.
UK Power Networks	None	N/A

Question 5: Do you agree with the proposed implementation approach for CP1563?

Summary

Yes	No	Neutral/No Comment	Other
5	1	0	0

Responses

Respondent	Response	Rationale
Scottish Power	Yes	N/A
The Electricity Network Company Ltd (ETCL)	Yes	We believe a November 2022 release provides adequate time to update internal processes.
Northern Power Grid	Yes	For the reasons outlined in the consultation document.
IMServ	Yes	N/A
Western Power Distribution	Yes	We agree with the proposed implementation approach as it aligns with the associated REC R0031 implementation approach.
UK Power Networks	Yes	The date of November 2022 will ensure that the minor changes to be carried out can be met in the given timescale for this change

Question 6: Do you have any further comments on CP1563?

Summary

Yes	No
0	6

Responses

Respondent	Response	Comments
Scottish Power	No	N/A
The Electricity Network Company Ltd (ETCL)	No	N/A
Northern Power Grid	No	N/A
IMServ	No	N/A
Western Power Distribution	No	N/A
UK Power Networks	No	N/A

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Respondent	Location	Comment
Scottish Power	N/A	N/A
The Electricity Network Company Ltd (ETCL)	N/A	N/A
Northern Power Grid	N/A	N/A
IMServ	N/A	N/A
Western Power Distribution	N/A	N/A
UK Power Networks	N/A	N/A