

## CP Progression Paper

### Altering the Trigger Point for CT Commissioning

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#### About This Document



Not sure where to start? We suggest reading the following sections:

- Have 5 mins? Read section 1
- Have 15 mins? Read sections 1, 4, 5 and 6
- Have 30 mins? Read all sections
- Have longer? Read all sections and the annexes and attachments

This document provides information on a new Change Proposal (CP) and outlines our proposed progression timetable for this change, including when it will be issued for CP Consultation in the next suitable Change Proposal Circular (CPC) batch.

We are presenting this paper to the SVG on 5 April 2022 to capture any comments or questions from Committee Members on this CP before we issue it for consultation.

There are three parts to this document:

- This is the main document. It provides a summary of the solution, impacts, anticipated costs, and proposed implementation approach, as well as our proposed progression approach for this CP.
- Attachment A contains the CP proposal form.
- Attachment B contains the proposed redlined changes to deliver the CP solution.



#### Committee

Supplier Volume  
Allocation Group (SVG)



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## 1. Summary

### Why change?

The Proposer considers that the trigger points for Current Transformer Commissioning and subsequent sending of data flows within [BSCP515 'Licensed Distribution'](#)<sup>1</sup> and the [Retail Energy Code \(REC\) Metering Operations Schedule](#)<sup>2</sup> are not appropriate for Current Transformer (CT) operated metering systems of all types.

### Solution

This CP seeks to amend BSCP515 section 3.3.A.1 to include the date of D0139 'Confirmation or Rejection of Energisation Status Change' receipt from Meter Operator Agents (MOAs) as the trigger point for Commissioning countdown. It splits out the different timescales for where the Licensed Distribution System Operator (LDSO) (16 Working Days (WD)) or MOA (11WD) energises to account for the potential 5WD to send the D0139 when MOA energises.

The CP also seeks to amend BSCP515 section 3.3.A.2 to remove the reference to sending the Commissioning information no later than 5WD after Commissioning (action 3.3.A.1) and replace it with sending it no later than 21WD after Energisation (if LDSO energises) or 16WD after receipt of D0139 if MOA energises. This allows extra time for the LDSO to send the D0383 'Notification of Commissioning Information' but retain the existing overall timescale of within 21WD of Energisation (or notification of Energisation via the D0139).

### Impacts and costs

This CP will impact LDSOs and MOAs. This CP will require changes to BSCP515.

This CP is a cross-code change with the REC and will require changes to the Metering Operations Schedule.

This CP is not expected to incur any costs to industry as it is a document only change. The cost of amending these documents is expected to be <£1k.

### Implementation

This CP is recommended for implementation on 3 November 2022 as part of the standard November 2022 BSC Release.

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<sup>1</sup> <https://www.elexon.co.uk/documents/bsc-codes/bscps/bscp515-2/>

<sup>2</sup> <https://recportal.co.uk/en/the-rec-public>

## 2. Why Change?

### What is the issue?

The LDSO and MOA have Commissioning responsibilities for both Supplier Volume Allocation (SVA) and Central Volume Allocation (CVA). The trigger point for Commissioning timescales to begin in BSCP515 3.3.A and the Metering Operations Schedule is the date of physical Energisation of the supply.

The trigger for the LDSO to send the D0383 within the same procedures is the completion date of Commissioning. The Proposer suggests that these trigger points are problematic for the following reasons:

- The LDSO is often not aware of the Energisation date of a Low Voltage (LV) CT operated fused supply at the time of Energisation as the MOA receives instruction to Energise from the Supplier (independently of the LDSO) and inserts the fuses. Therefore, the LDSO may not be aware of the Energisation until they receive the D0139 from the MOA. This could be up to 5WD after Energisation so could reduce the LDSO's available Commissioning time to 11WD;
- The MOA is often not aware of the Energisation date of a LV and High Voltage (HV) circuit breaker supply at the time of Energisation as the LDSO receives instruction to Energise from the Supplier (independently of the MOA) and closes the circuit breaker. There will always be a Meter installed prior to Energisation but the MOA may not be aware of the Energisation until they receive the D0139 from the LDSO. This could be up to 5WD after Energisation so could reduce the MOA's available first commission attempt time to 27WD;
- For a fused supply, the LDSO may not be aware of who the MOA is to send the commission information to via a D0383 until a D0139 is received. This is often the point at which the LDSO first becomes aware that a fused supply is Energised. This may be several days/weeks/months after LDSO Commissioning. Therefore, there will be times where it is impossible for the LDSO to send the D0383 within 5WD of Commissioning;
- LV CT pre-installed, pre-commissioned metering units are usually commissioned to CoP4 requirements in the factory or workshop. As the trigger to send the D0383 to MOA is the Commissioning completion date, it is highly unlikely that the data flow will be sent within 5WD of Commissioning as the unit is unlikely to have been installed at that point. Even if the final Commissioning checks are carried out during installation and that date is used as the Commissioning date, it would still rely on a MOA being appointed at that point, which is often not the case;
- Circuit breaker CT operated metering systems may be commissioned by LDSOs prior to Energisation by use of injection. Therefore, it is possible to send the D0383 to the MOA within 5WD of Commissioning, but prior to Energisation, on the occasions where a MOA has been appointed. However, there are occasions where a MOA has not been appointed within 5WD of Commissioning making it impossible for the LDSO to send the D0383 within time limits. In any event, the LDSO will only send the D0383 where the MOA has been formally appointed in the Supplier Meter Registration Service (SMRS);
- The relatively small timeframe of 5WD after Commissioning to send the D0383 is proving to be very problematic to many LDSOs due to operational difficulties in transferring the Commissioning data from site to the back office in order to populate the D0383. This has resulted in a number of non-conformances.

Overall, the Proposer considers that the trigger points for Commissioning and subsequent sending of data flows within BSCP515 and the REC Metering Operations Schedule are not appropriate for CT operated metering systems of all types.

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## Background

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### Energisation

Within the BSC Energisation means “in relation to any Boundary Point or Systems Connection Point (or any Plant or Apparatus connected to any System at such a point), the movement of any isolator, breaker or switch or the insertion of any fuse, so as to enable electricity to flow, at such point to and from a System; and “energise” and “energised”, shall be construed accordingly”.

### CT Commissioning process

Commissioning of SVA CT Metering Systems is set out in BSC [CoP4 ‘Commissioning of measurement transformers for Settlement purposes’](#)<sup>3</sup>. The process where the overall installation of a CT Metering System takes place and the subsequent transfer of Commissioning related data via data flows is set out in the Metering Operations Schedule of the REC and BSCP515.

The BSCPs allow a sequence of interdependent steps to occur to facilitate processes to be completed within set timescales. CT operated Metering System Commissioning timescales were set through [CP1458 ‘Introduction of timescales for the P283 Commissioning process for SVA CT operated Metering Systems’](#)<sup>4</sup>, implemented on 3 November 2016. CP1548 introduced timescales in relation to activities performed during the Commissioning process of CT operated Metering Systems in the SVA market. The timescales relate to the LDSO, MOA and Supplier activities to ensure that the process is completed within a reasonable timescale and before incorrect data can enter Settlement. The timescales were built around:

- The Energisation status of the physical connection on site;
- The Settlement Run timescales for the Initial Settlement Run; and
- The overall process taking no longer than 26 Working Days (WD).

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### Revision of the Commissioning timescales

[CP1496 ‘Introduction of two data flows for the Commissioning process for Half Hourly \(HH\) SVA \(CT\) operated Metering Systems’](#)<sup>5</sup> was implemented on 1 November 2018 and revised the basic activity timescales to:

- LDSO Commissioning - up to 16WD after Energisation;
- LDSO pass Commissioning information to HHMOA - within 5WD after Commissioning;
- Half Hourly Meter Operating Agent (HHMOA) first attempt at Commissioning – up to 32WD after Energisation
- HHMOA advise Supplier of completion – within 5WD of Commissioning.
- HHMOA final deadline to complete Commissioning – within 80WD of Energisation.

[Following CP1505 ‘Allowing ‘off site’ Commissioning of current transformers pre-installed in cut-outs or switchgear at manufacture for use in LV installations’](#)<sup>6</sup> (also implemented on 1 November 2018), many LDSOs are now using LV CT pre-installed, pre-commissioned metering units for fused supplies which still meet the Commissioning requirements of CoP4. As these units are factory commissioned, the vast majority of the LDSO Commissioning for the units will be completed prior to installation and therefore, before Energisation.

The key to the LDSO Commissioning activity timescales within CP1496 is to complete steps one and two within 21WD of Energisation (16WD to commission, 5WD to send the information). This covers pre-commissioned units as well as supplies commissioned on site pre and post Energisation. It should allow sufficient overall time to complete Commissioning

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<sup>3</sup> <https://www.elexon.co.uk/guidance-note/cop4-commissioning-measurement-transformers-settlement-purposes/>

<sup>4</sup> <https://www.elexon.co.uk/change-proposal/cp1458>

<sup>5</sup> <https://www.elexon.co.uk/change-proposal/cp1496>

<sup>6</sup> <https://www.elexon.co.uk/change-proposal/cp1505>

and then send off the results via data flow to the MOA within a timescale that will not impact the Initial Settlement Run factored into the timescale requirements of CP1458.

The Supplier is responsible for the Energisation of the supply. They select the date for Energisation and request either the MOA or LDSO to Energise dependant on supply arrangement. For LV fused supplies, it is the responsibility of the MOA to first Energise a supply by insertion of the main fuse. For LV and HV circuit breaker supplies, the LDSO is responsible for Energisation. The LDSO and MOA, as appropriate, is required to send a D0139 when the Energisation status of a site is changed - the LDSO to the MOA and Supplier, the MOA to the LDSO and Supplier (and Data Collector). In accordance with the Metering Operations Schedule and BSCP515, this can be up to 5WD after Energisation.

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### 3. Solution

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#### Proposed solution (BSC)

Amend BSCP515 section 3.3.A.1 to include the date of D0139 receipt from MOA as the trigger point for Commissioning countdown. It splits out the different timescales for where the LDSO (16WD) or MOA energises (11WD) to account for the potential 5WD to send the D0139 when MOA energises.

Amend BSCP515 section 3.3.A.2 to remove the reference to sending the Commissioning information no later than 5WD after Commissioning (action 3.3.A.1) and replace it with sending it no later than 21WD after Energisation (if LDSO energises) or 16WD after receipt of D0139 if MOA energises. This allows extra time for the LDSO to send the D0383 but retain the existing overall timescale of within 21WD of Energisation (or notification of Energisation via the D0139).

The D0139 is to become the trigger point for the initial Commissioning of the Metering Equipment. Provided the Metering Equipment is Commissioned then a temporary de-energisation or re-energisation would not trigger a need for Commissioning information to be sent again.

It should be noted that this CP has been discussed at the [Technical Assurance of Metering Expert Group \(TAMEG\)](#)<sup>7</sup>, who supported the solution.

This BSC CP is also being progressed alongside a REC Modification which will amend the Metering Operations Schedule.

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#### Proposer's rationale

The Proposer believes the trigger points for LDSO and MOA actions in the Commissioning process of BSCP515 and the Metering Operations Schedule are not suitable. Therefore, this change recommends a change to the trigger points.

The Proposer considers that the trigger points for the commission process timescales should still be related to the Energisation of the supply, but not the physical Energisation date. We believe the trigger point for Commissioning timescales to begin should be the receipt date of the D0139. Though it may seem logical to use the D0139 data item J0014 'Date of Action' as the trigger point, this is still problematic as the Date of Action (the date on which the action was performed – Energisation in this case) within the D0139 can be back-dated by several months making it unsuitable. Therefore, we propose to use the date of receipt of the D0139 as the trigger point.

As the overall timescales for LDSO Commissioning and sending of D0383 have remained the same as they currently are, there is no adverse impact on the MOA or Supplier because of this change proposal.

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#### Proposed redlining

The proposed redlining to BSCP515 for this CP can be found in Attachment B of this paper.

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<sup>7</sup> <https://www.elexon.co.uk/group/technical-assurance-of-metering-expert-group-tameg/>

## 4. Impacts and Costs

### BSC Party & Party Agent impacts and costs

#### BSC Party & Party Agent Impacts

BSC Party/Party Agent	Impact
LDSOs	Low
MOAs	Low

The impacts of this CP should only impact local working instructions and internal working procedures.

### Central impacts and costs

This CP will require changes to BSCP515. We do not expect there to be any central system impacts however this will be confirmed through CP Consultation.

#### Central impacts

#### Central Impacts

Document Impacts	System Impacts
• <a href="#">BSCP515 'Licensed Distribution'</a> <sup>8</sup>	• None

#### Impact on BSC Settlement Risks

#### Impact on BSC Settlement Risks

We expect a positive impact on [016 SVA Risk: Energisation Status incorrect](#)<sup>9</sup> as this change should allow LDSOs to notify of Energisation status within the correct timeframe. This CP should reduce faults being issued from the DC's to the MOA when asking for the Energisation dates to be amended.

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#### Central costs

The central implementation costs for this CP will be approximately <1k.

<sup>8</sup> <https://www.elexon.co.uk/documents/bsc-codes/bscps/bscp515-2/>

<sup>9</sup> <https://www.elexon.co.uk/reference/performance-assurance/performance-assurance-processes/016-sva-risk-energisation-status-incorrect/>

## 5. Implementation Approach

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### Recommended Implementation Date

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This CP is recommended for implementation on 3 November 2022 as part of the standard November 2022 BSC Release.

The rationale for aiming for this, the earliest available release is so that we can realise the anticipated benefits to our customers as soon as possible. This also aligns with the timescales for the REC CP related to this change.

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## 6. Proposed Progression

### Progression timetable

The table below outlines the proposed progression plan for this CP:

BSC Progression Timetable	
Event	Date
CP Progression Paper presented to SVG for information	5 April 2022
CP Consultation	11 April 2022 – 6 May 2022
CP Assessment Report presented to SVG for decision	7 June 2022
Proposed Implementation Date	3 November 2022 (November 2022 Release)

REC Progression Timetable	
Event	Date
Deadline for alternative Change Proposal submission	8 April 2022
Preliminary Change Report issued	8 April 2022
Consultation period	8 April 2022 – 4 May 2022
Final Change Report issued	27 May 2022
Responsible Committee decision	8 June 2022
Appeal window closure	23 June 2022

### CP Consultation questions

We intend to ask the standard CP Consultation questions for this CP. We do not believe any additional questions need to be asked for this CP.

Standard CP Consultation Questions	
Do you agree with this CP's proposed solution?	SVG254/05
Do you agree that the draft redlining delivers this CP's proposed solution?	CP1563
Will this CP impact your organisation?	CP Progression Paper
Will your organisation incur any costs in implementing this CP?	5 April 2022
Do you agree with the proposed implementation approach for this CP?	Version 1.0

## 7. Recommendations

We invite the SVG to:

- **NOTE** the proposed progression timetable for the CP; and
- **PROVIDE** any comments or additional questions for inclusion in the CP Consultation.

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