

CP Consultation

CP1563 ‘Altering the Trigger Point and subsequent Timescales for Commissioning SVA CT Operated Metering Systems and issue of Data Flow’



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Committee

Supplier Volume
Allocation Group (SVG)



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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
- *You can find the definitions of the terms and acronyms used in this document in the [BSC Glossary](#)*



The purpose of this second Change Proposal (CP) Consultation is to invite BSC Parties, Party Agents and other interested parties to provide their views on the impacts and the merits of CP1563. The SVG will then consider the consultation responses before making a decision on whether or not to approve CP1563.

There are 5 parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, and proposed implementation approach. It also summarises the SVG’s initial views on the proposed changes.
- Attachment A contains the updated CP proposal form.
- Attachment B contains the updated proposed redlined changes to deliver the CP1563 solution.

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- Attachment C contains the specific questions on which we seek your views. Please use this form to provide your response to these questions, and to record any further views or comments you wish to be considered.
- Attachment D contains the full responses received to the first CP Consultation.

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'](#)¹ and the [Retail Energy Code \(REC\) Metering Operations Schedule](#)² are not appropriate for Current Transformer (CT) operated metering systems of all types.

Solution

CP1563 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 will be no later than 16 Working days (WD) after energisation (if the Licensed Distribution System Operator (LDSO) energises) or 16 WD after receipt of the D0139 from the Half Hourly Meter Operator Agent (HHMOA) (if HHMOA 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 21WD after receipt of D0139 if MOA energises. This allows extra time for the LDSO to send the D0383 'Notification of Commissioning Information'; and creates a slight extension to the overall timescales of Commissioning and sending the related Commissioning information by 5WD (to account for the 5WD the MOA has to send the D0139 following energisation) where an MOA energises the Metering System.

Impacts and costs

CP1563 will impact LDSOs and MOAs and will require changes to BSCP515.

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

CP1563 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

CP1563 is recommended for implementation on 3 November 2022 as part of the standard November 2022 BSC Release.

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¹ <https://www.elexon.co.uk/csd/bscp515-licensed-distribution/>

² <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:

- LV CT pre-installed, pre-Commissioned metering units are usually Commissioned to CoP4 requirements in the factory or workshop well before any MOAs are appointed or the before the CTs are even installed. 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. Sending the D0383 within 5WD then becomes impossible where the CTs are Commissioned off-site because it happens before an MOA is appointed. 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;
- 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;
- 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.

Background

CT Commissioning process

Commissioning of SVA CT Metering Systems is set out in BSC [CoP4 'Commissioning of measurement transformers for Settlement purposes'](#)³. 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'](#)⁴, implemented on 3 November 2016. CP1458 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).

Revision of the Commissioning timescales

[CP1496 'Introduction of two data flows for the Commissioning process for Half Hourly \(HH\) SVA \(CT\) operated Metering Systems'](#)⁵ 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'](#)⁶ (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



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”.

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

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

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

⁶ <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.

3. Solution

Initially proposed solution

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 CP1563 has been discussed at the [Technical Assurance of Metering Expert Group \(TAMEG\)](#)⁷, who supported the solution.

This BSC CP is also being progressed alongside [R0031 'Altering the Trigger Points for CT Commissioning'](#)⁸ which will amend the Metering Operations Schedule.

Revised solution

Following the closure of the first CP1563 Consultation, it was identified that different versions of red lined text had been issued for consultation under the BSC and REC and that the Proposer's preferred solution will have an impact on overall Commissioning timescales.

The latest version of the solution proposes that where the LDSO energises the Metering System, they will have 16WD to Commission the measurement transformers from the date of energisation (retaining the existing timescales). However where the MOA energises, the trigger point for Commissioning timescales to begin is the date of receipt of the D0139. As the MOA has 5WD to send the D0139 following energisation, this extends the overall timescales for Commissioning as the LDSO will now have 21WD from energisation to Commission the measurement transformers and an extra 5WD to send the D0383. This means that from the date of energisation, the overall timescales for the MOA to receive the D0383 have changed from 21WD following energisation to 26WD following energisation (taking into account the 5WD the MOA has to send the D0139).

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

⁸ <https://recportal.co.uk/group/guest/-/dno-lv-ct-commissioning-trigger-points-timescales>

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. The Proposer believes 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.

Whilst the current overall timescales to Commission and send Commissioning related information of 21WD from energisation will be extended slightly to 26WD from energisation (where an MOA energises), this should not pose a greater risk to Settlement for the following reasons:

1. The timescales are only extended where the MOA energises. This means the Metering Equipment has already been installed, and is in situ, so it is likely that the LDSO has already Commissioned the CTs as they are likely to be installed in pre-commissioned units. This is because MOAs can only energise LV cut-out CTs (as per the Meter Operation Code of Practice (MOCOP)) which generally are served by pre commissioned CTs.
2. Even in the unlikely event that the LDSO hasn't Commissioned and will need to attend site after energisation to carry out Commissioning, due to the nature of cut out located LV CTs, it is highly likely that the MOA will carry out end to end Commissioning checks anyway as they can easily access the primary measurements on these type of installations.

CP Consultation Question

Do you agree with the CP1563 proposed solution?

Please provide your rationale.

We invite you to give your views using the response form in Attachment C

Proposed redlining

The updated proposed redlining to BSCP515 for CP1563 can be found in Attachment B of this paper. The initial proposed redlining can be found in Attachment B of the initial consultation, which can be found on the [CP1563 webpage](#).

CP Consultation Question

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

If 'No', please provide your rationale.

We invite you to give your views using the response form in Attachment C

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4. Impacts and Costs

BSC Party & Party Agent impacts and costs

Participant impacts

BSC Party & Party Agent Impacts

BSC Party/Party Agent	Impact
LDSOs	Low
MOAs	Low

We only expect CP1563 to impact local working instructions and internal working procedures but we seek to confirm these impacts through CP consultation.

Participant costs

CP1563 is not expected to have any costs for Market Participants.

Central impacts and costs

CP1563 will require changes to BSCP515. There are no central system impacts.

Central impacts

Central Impacts

Document Impacts	System Impacts
• BSCP515 'Licensed Distribution' ⁹	• None

Central costs

The central implementation costs for CP1563 will be approximately <1k.

⁹ <https://www.elexon.co.uk/csd/bscp515-licensed-distribution/>

CP Consultation Questions

Will CP1563 impact your organisation?

If 'Yes', please provide a description of the impact(s) on your organisation and any activities which you will need to undertake between the approval of CP1563 and the CP1563 Implementation Date (including any necessary changes to your systems, documents and processes). Where applicable, please state which of the roles that you operate as will be impacted and any differences in the impacts between each role.

Will your organisation incur any costs in implementing CP1563?

If 'Yes', please provide details of these costs, how they arise and whether they are one-off or on-going costs.

We invite you to give your views using the response form in Attachment C

Impact on BSC Settlement Risks

Impact on BSC Settlement Risks

We expect a positive impact on [016 SVA Risk: Energisation Status incorrect](#)¹⁰ as this change should allow LDSOs to notify of Energisation status within the correct timeframe. CP1563 should reduce faults being issued from the DCs to the MOA when asking for the Energisation dates to be amended.

¹⁰ <https://www.elexon.co.uk/reference/performance-assurance/performance-assurance-processes/016-sva-risk-energisation-status-incorrect/>

5. Implementation Approach

Recommended Implementation Date

CP1563 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 R0031 which is related to this change.

CP Consultation Question

Do you agree with the proposed implementation approach for CP1563?

Please provide your rationale.

We invite you to give your views using the response form in Attachment C

SVG's initial views

An SVG member suggested that LDSOs should know who the MOA is and what the energisation status is as it is recorded in SMRS. Otherwise there are compliance issues around Suppliers not updating SMRS appropriately which could potentially be better to be addressed. Additionally, they noted that MOAs should know the state of a Metering System, particularly for HV sites where they would have a direct contract with the customer. Following this, the SVG wanted to add some additional questions to the consultation to clarify whether participants are seeing issues in terms of notification timescales.

After discussion with the Subject Matter Expert (SME) post-meeting, Elexon agreed with the SVG not to include the additional questions, rather to clarify the challenges faced which have led to this CP being raised. It isn't that LDSOs don't know who the appointed MOA is or don't know the energisation status, it's that off-site Commissioning takes place prior to any agent appointments or energisation. Since the introduction of off-site Commissioning, CTs are often Commissioned at manufacture well before any MOAs are appointed or the before the CTs are even installed. The current requirement is that LDSOs send the D0383 5WD following Commissioning but this is impossible where the CTs are Commissioned off-site because it happens before an MOA is appointed.

The SVG was curious as to why the timescales were set as they currently are and questioned whether the timescales and flows that were introduced for Commissioning came from [P283 'Reinforcing the Commissioning of Metering Equipment Processes'](#)¹¹. Elexon replied that a lot of them started there but they were updated by CP1496. They were originally set as 16WD from energisation to broadly align with Settlement Final Run.

The SVG was concerned that if we're not changing the overall timescales, is there the risk of data being late if we change the trigger points and then what is the following knock-on impact? Elexon replied that currently the maximum amount of time that can pass before a D0383 is sent (compliantly) is 21WD following energisation which is not changing under this CP. The intention of the CP is to allow LDSOs to still be compliant where Commissioning has taken place off-site and before any appointments or energisation has happened.

¹¹ <https://www.elexon.co.uk/mod-proposal/p283/>

7. Industry Views – First CP Consultation

This section summarises the responses received to the first CP Consultation. You can find the full responses in Attachment D of the initial consultation documentation. There were 6 respondents with represented roles of Supplier, MOA and Distributor.

Summary of CP1563 CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1563 proposed solution?	6	0	0	0
Do you agree that the draft redlining delivers the intent of CP1563?	5	1	0	0
Will CP1563 impact your organisation?	6	0	0	0
Will your organisation incur any costs in implementing CP1563?	2	4	0	0
Do you agree with the proposed implementation approach for CP1563?	6	0	0	0
Do you have any further comments on CP1563?	0	6	0	0

Responses to the first CP consultation were under the assumption that there would be no changes to the overall Commissioning timescales.

All respondents were in support of the CP solution and agreed that there would be minimal costs to them. Most impacts would be through a requirement to update internal processes. One respondent commented that they did not believe it was clear whether the start date for when LDSOs have to Commission is the action date held within the D0139 or the D0139 sent date. In order to make this minor amendment to the redlining, it would also need to be reflected in the redlining for R0031, of which the consultation period has already closed. Elxon therefore agreed with the Proposer that the redlining was already clear enough that the start date is the date of receipt of the D0139 and so the redlining has not been amended to include this update.

8. Committee Views – Following First CP Consultation

SVG views following first CP Consultation

The SVG were concerned with the assumption that MOAs would primary Commission every time as for some transformers it is not physically possible as they are sealed. The SVG wanted to be clear that it is the LDSO's responsibility to issue the information upon request. Elexon agreed that it is the LDSO's job to make sure that the CTs are always Commissioned.

The SVG approved issuing CP1563 for a second consultation on the basis that the solution and red lined text had changed from the first consultation issued under the BSC.