

## 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 &amp; other CT metering described in the Proposal Form.</p> <p>We would request clarification that the new timelines apply to energisation of supply &amp; 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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|                            |     |   |
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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 | 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. 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. |

## 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. |
|-------------------|-----|--|

## 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 |
|-----|----|--------------------|-------|
| 6   | 0  | 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     |