

CP Consultation Responses

CP1565 'Updating BSCP520 to address operational issues in the Central Management System'

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

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Power Data Associates Ltd	0 / 1	Supplier Agent: Meter Administrator
Western Power Distribution	1 / 0	Distributor

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
Power Data Associates Ltd	✓	✓	✓	✓
Western Power Distribution	✓	✓	✓	✓

CP1565

CP Consultation
Responses

8 August 2022

Version 1.0

Page 2 of 10

© Elexon 2022

Question 1: Do you agree with the CP1565 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
2	0	0	0

Responses

Respondent	Response	Rationale
Power Data Associates Ltd	Yes	<p>Yes, we agree that there is a need for both a clearer Test specification, and fault reporting process for CMS.</p> <p>The Test specification has historically been found difficult to follow by some parties and can be open to interpretation around the tests required.</p> <p>We have also found that some of the CMS providers today, who are using systems built upon already approved platforms, struggle with some of the concepts of the requirements for using a CMS in the Unmetered arrangements and do not always either understand or follow the requirements.</p> <p>We also support the concept of an MA acting as the CMS test agent. Whilst that would create work on the MA – the MA is the closest to the use of the CMS data and also in being aware of some of the issues that can arise that causes errors – and so we support this as the involvement from the MA should help to ensure some issues aren't missed or not seen or understood in amongst test evidence.</p> <p>It is also very clear by the amount of CMS Under Reports today, that a noticeable impact is being had on Settlement resulting from this. It isn't always immediately clear to the MA what the cause is, nor is it always an issue that an MA necessarily has any responsibility over. Issues are most commonly down to the Customer Inventory that is being used by the MA containing incorrect data, or on the CMS provider not providing data required, or mismatches between the CMS system and Customer Inventory. So this change introduces a much better standard against which this</p>

[CP1565](#)

[CP Consultation Responses](#)

[8 August 2022](#)

[Version 1.0](#)

[Page 3 of 10](#)

[© Elexon 2022](#)

		should be investigated, enabling other parties to be informed, and introducing escalation routes should they end up being required. It also enables the UMSO, as the party responsible for ensuring the inventory provided is as accurate as possible, to gain access to information seen by the MA and would require CMS event log data to be able to verify this made available to them when it is found not to be accurate.
Western Power Distribution	Yes	-

Question 2: Do you agree that the draft redlining delivers the CP1565 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
2	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
Power Data Associates Ltd	Yes	Yes it delivers the proposed solution – but there a few typographical points added to the section below.
Western Power Distribution	Yes	Although we agree that the red-lining delivers the CP1565 proposed solution, we have noted the following missing steps: 3.17.8 covers the scenario where the CMS provider corrects the fault, however, it doesn't stipulate what will happen if CMS approval is removed for a specific manufacturer, or how are those affected customers to be treated if their CMS is no longer approved? Nor does it stipulate what checks will be made on the existing approved systems – will additional testing/checks be made to ensure those systems meet the new updated testing and fault reporting process?

Question 3: Will CP1565 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
2	0	0	0

Responses

Respondent	Response	Rationale
Power Data Associates Ltd	Yes	<p>It will impact as it will generate some further activity that we as Meter Administrator will need to undertake, but this impact is a positive that will ensure more accuracy in this industry area. Activities we will need to undertake will include one-off tasks to:</p> <ul style="list-style-type: none">- prepare a methodology for carrying out CMS approvals for manufacturers.- documenting procedures to ensure CMS faults are recognised to ensure the obligations in the BSCP520 are followed.
Western Power Distribution	Medium	Process and document updates for our UMSO role.

Question 4: Will your organisation incur any costs in implementing CP1565?

Summary

Yes	No	Neutral/No Comment	Other
2	0	0	0

Responses

Respondent	Response	Rationale
Power Data Associates Ltd	Yes	Costs will be in staff time for ongoing tasks to: <ul style="list-style-type: none">- carry out CMS approval activities- report and follow up on any CMS faults advised to us as MA, or found by us.
Western Power Distribution	Low	Implementation costs will be low as these will be primarily process and document updates for our UMSO role. However, there will be ongoing costs in resource for this new process.

Question 5: Do you agree with the proposed implementation approach for CP1565?

Summary

Yes	No	Neutral/No Comment	Other
2	0	0	0

Responses

Respondent	Response	Rationale
Power Data Associates Ltd	Yes	We support the view that this should be implemented as soon possible.
Western Power Distribution	Yes	-

Question 6: Do you have any further comments on CP1565?

Summary

Yes	No
0	2

Responses

Respondent	Response	Comments
Power Data Associates Ltd	No	-
Western Power Distribution	No	-

BSCP520

Respondent	Location	Comment
Power Data Associates Ltd	1.7.2	The definition of the “CMS Test Agent”, and “Charge Code” have been merged into one paragraph – this is just a typographic error from the red-lining.
	4.6.3.2	In the opening paragraph, “meter” should read “Equivalent Meter”
	4.6.3.3f	“In the event that all or part of the operational event log is not available for any reason, the MA system shall apply data representative of the Switch Regime indicated in the CMS control file provided by the UMSO. This regime shall be applied for each of the affected Settlement Days affected.”