

## CP Consultation

### CP1588 ‘Mandating Calibration Checks to Main and Check Meters’

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#### Committee

Imbalance Settlement Group (ISG) and Supplier Volume Group (SVG)



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#### About This Document

You can find the definitions of the terms and acronyms used in this document in the [BSC Glossary](#)<sup>1</sup>.

The purpose of this 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 CP1588. The ISG and SVG will then consider the consultation responses before making a decision on whether or not to approve CP1588.

There are four 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 ISG and SVG’s initial views on the proposed changes.
- Attachment A contains the CP Proposal Form.
- Attachment B contains the proposed redlined changes to deliver the CP1588 solution.
- 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.



CP1588

CP Consultation

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<sup>1</sup> <https://www.elxon.co.uk/glossary/?show=all>



## Not sure where to start?

We suggest reading the following sections:

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

## Why change?

[Code of Practice \(CoP\) 4](#)<sup>2</sup> 'Code of Practice for Calibration, Testing and Commissioning Requirements of Metering Equipment for Settlement Purposes' details the requirements for calibration, testing and commissioning of Metering Equipment used for Settlement purposes. The frequency and timing of Meter calibrations is specified in CoP4 as well as the required test points.

There is a lack of industry reporting to confirm whether Meter calibration checks are being carried out on the relevant Metering Equipment which poses a risk to Settlement where a lack of data being reported does not allow any analysis to highlight concerns about Meter accuracy to be carried out.

There is also no process for Elexon to follow in [BSCP601](#)<sup>3</sup>: Metering Protocol Approval and Compliance Testing to take action should it be identified that there is an issue with the long term accuracy of a particular Meter Type or, as required, notify the Office of Product Safety and Standards in the Department for Business and Trade where the Meter Type is on [Schedule 4](#)<sup>4</sup> of the [Electricity Act](#).

## Solution

This CP would create a new section 5.2A in CoP4 to detail the requirements and timescales for End of Life sample calibrations. These will focus on Meter Types used in [CoP3](#)<sup>5</sup>: 'The Metering of Circuits with a Rated Capacity not exceeding 10MVA for Settlement Purposes' and [CoP5](#)<sup>6</sup>: 'The Metering of Energy Transfers with Max Demand of up to (and including) 1MW for Settlement Purposes', Metering Systems.

## Impacts and costs

This CP is expected to be a document only change and the estimated central implementation costs for this CP will be approximately <£2k.

## Implementation

This CP is proposed for implementation on 29 February 2024 as part of the Standard February BSC Release.

<sup>2</sup> [CoP4 'Code of Practice for the Calibration, Testing and Commissioning Requirements of Metering Equipment for Settlement Purposes'](#)

<sup>3</sup> [BSCP601: Metering Protocol Approval and Compliance Testing](#)

<sup>4</sup> [Electricity Act 1989: Statutory register of all pattern approved electricity meters suitable for billing purposes in the UK - Schedule 4: UK nationally approved electricity meters](#)

<sup>5</sup> [Code of Practice 3 'The Metering of Circuits with a Rated Capacity not exceeding 10MVA for Settlement Purposes'](#)

<sup>6</sup> [Code of Practice 5 'The Metering of Energy Transfers with Max Demand of up to \(and including\) 1MW for Settlement Purposes'](#)

## 2. Why Change?

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### What is the issue?

Code of Practice (CoP) 4 details the requirements for calibration, testing and commissioning of Metering Equipment used for Settlement purposes. The calibration requirements for Meters are split into a Type A initial calibration and a Type B or C periodic calibration. The frequency and timing of Meter calibrations is specified in CoP4 as well as the required test points.

There is a lack of industry reporting to confirm whether Meter calibration checks are being carried out on the relevant Metering Equipment which poses a risk to Settlement where a lack of data being reported does not allow any analysis to highlight concerns about Meter accuracy to be carried out.

Appendix A of CoP4 specifies that for CoP3 and CoP5, after the initial calibration of the Meter pre-installation, there is no a requirement for a periodic calibration until year 15 for a Type B and year 20 for a Type C. With the low level of capital expenditure, compared to calibration testing, for CoP3 and CoP5 compliant Meters Registrants and Meter Operator Agents (MOAs) are choosing to replace the Meter prior to year 15, or year 10 if subject to a [certification period](#)<sup>7</sup> rather than perform a periodic calibration. As a consequence of this Elexon (BSCCo) has no data on the performance of the Meter, in terms of the errors and the drift from the initial calibration, to determine if there is a risk to Settlement posed by the use of a particular Meter Type.

There is also no process for Elexon to follow in BSCP601 to take action should it be identified that there is an issue with the long term accuracy of a particular Meter Type or, as required, notify the Office of Product Safety and Standards in the Department for Business and Trade where the Meter Type is on Schedule 4.

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### Background

The [Issue 93](#)<sup>8</sup> 'Review of the BSC metering Codes of Practice' group discussed an aspect with the intent of defining a process to deal with determining if Meter sample and periodic calibration checks are required to confirm the performance of particular Meter Types. The Workgroup highlighted the need for this requirement to trigger a recognition of a higher risk of failure at End of Life and potentially inaccuracy.

The Workgroup arrived at the following areas to consider/progress:

- Parties must adhere to the requirement for completing a calibration (sample and periodic) check, if it is clearly set out in CoP4; and
- It was important to ensure Meter accuracy was known, if Meters were being replaced prior to their periodic calibration check, End of Life testing should be required.

The following conclusions resulted from the Workgroup;

- Continue and reinforce the current calibration check process (periodic and sample calibrations);
- Introduce CoP specific End of Life testing; and

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<sup>7</sup> [Electricity Act 1989: Statutory register of all pattern approved electricity meters suitable for billing purposes in the UK - Schedule 4: UK nationally approved electricity meters](#)

<sup>8</sup> [Issue 93 'Review of the BSC metering Codes of Practice'](#)

- Introduce End of Life testing (CoP specific sample testing of existing Meter Types e.g. CoP3 and CoP5).

The recommendations were presented to, and noted by, the [BSC Panel on 8 September 2022 \(330/08\)](#)<sup>9</sup>.

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<sup>9</sup> [BSC Panel 330/08](#)

### 3. Solution

#### Proposed solution

This CP would create a new section 5.2A in CoP4 to detail the requirements and timescales for End of Life sample calibrations. These will focus on Meter Types used in CoP3 and CoP5 Metering Systems.

The Office for Product Safety & Standards (OPSS) [In Service Testing \(IST\) Handbook](#)<sup>10</sup> (May 2022 v3.61) section 7.0 'Sampling plan and criteria for meter populations requiring replacement' specifies the number of samples required for a known population size, as shown in the table below. Columns have been added to detail the percentage of the population range for the upper and lower limit.

Population	Sample Size	Lower % of Population	Upper % of Population
1,201 to 3,200	50	4.2%	1.6%
3,201 to 10,000	75	2.3%	0.75%
10,001 to 35,000	100	1.0%	0.29%
35,001 to 150,000	150	0.43%	0.1%
>150,000	200	0.13%	N/A

The CoP4 End of Life sample testing population ranges and sample sizes will be based on the population of a Meter Type an individual Meter Operator Agent is responsible for. As the Meter Types that do not fall under IST Handbook (i.e. over 100 kW and current transformer operated Meters) have significantly lower volumes the population ranges have been amended for the End of Life testing sample calibration. The following limits and sample sizes have been developed:

Population	Sample Size	Lower % of Population	Upper % of Population
100 to 500	5	5.0%	1.0%
501 to 2,000	10	2.0%	0.5%
2,001 to 10,000	20	1.0%	0.20%
>10,001	40	0.40%	N/A

An additional process has been added into BSCP601 section 2 'Interface and Timetable Information' for situations where BSCCo has identified an issue with errors following the analysis of End of Life sample calibration test results. This will involve notifying and liaising with the Office of Product Safety and Standards and then making a recommendation to the

<sup>10</sup> [Office for Product Safety & Standards In Service Testing Handbook](#)

Panel. This recommendation can be to instruct Parties to remove a particular Meter Type over a transitional period or prevent its continued installation.

Should this CP be approved Elexon will develop a process to identify the volumes of Meter Types a MOA is responsible for in CoP3 and CoP5 and develop a technique to analyse calibration test results to make an assessment, and if required a recommendation, on the accuracy performance of a Meter Type.

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## Proposer's rationale

This CP will provide an assurance process to confirm whether a Meter Type is still operating within the allowed accuracy limits or is drifting towards, or beyond, the extreme end of the limits. It will also define the steps to be taken where an issue is identified mitigating the risk to Settlement.

### CP Consultation Question

Do you agree with the CP1588 proposed solution?

*Please provide your rationale.*

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

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## Proposed redlining

The CP proposes to update CoP4 and BSCP601. The redlining to support this change can be found in Attachment B.

### CP Consultation Question

Do you agree that the draft redlining delivers the CP1588 proposed solution?

*If 'No', please provide your rationale.*

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

4. Impacts and Costs

BSC Party & Party Agent impacts and costs

Participant impacts

The only Party Agent identified to be impacted are Meter Operator Agents.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
Meter Operator Agents	Medium – Create processes for calibration testing (where not doing so currently under CoP4); remove Meters for calibration testing where an appropriate number of samples not available through churn; develop calibration test systems and traceability or outsource to third party calibration lab.

Participant costs

Central impacts and costs

Central impacts

The solution in this CP only affects BSC documentation. No BSC Central Systems or Agents will be impacted.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none"><li>CoP4 'Code of Practice for the Calibration, Testing and Commissioning Requirements of Metering Equipment for Settlement Purposes';</li><li>BSCP601 'Metering Protocol Approval and Compliance Testing'</li></ul>	<ul style="list-style-type: none"><li>None</li></ul>

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## Impact on BSC Settlement Risks

Impact on BSC Settlement Risks
None

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## Impact on Market-wide Half Hourly Settlement (MHHS)

Impact on MHHS
None

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## Central costs

The central implementation costs for CP1588 will be approximately <£2k.

CP Consultation Question
Will CP1588 impact your organisation? <i>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 CP1588 and the CP1588 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.</i>
Will your organisation incur any costs in implementing CP1588? <i>If 'Yes', please provide details of these costs, how they arise and whether they are one-off or on-going costs.</i>
We invite you to give your views using the response form in Attachment C.



5. Implementation Approach

Recommended Implementation Date

This CP is proposed for implementation on 29 February 2024 as part of the Standard February BSC Release. The proposed implementation date is to allow Elexon to develop, and put in place, processes to obtain Meter statistics data.

CP Consultation Question
Do you agree with the proposed implementation approach for CP1588? <i>Please provide your rationale.</i>
We invite you to give your views using the response form in Attachment C

## 6. Initial Committee Views

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### ISG's initial views

At their meeting on 7 November 2023 ([271/06](#)), the ISG was invited to note the progression of the CP and provide any comments or additional questions for inclusion in the CP Consultation.

The ISG did not form a quorate committee and were therefore unable to meet to consider CP1588. As the purpose of the presentation was for information only (no decision required), this CP will continue to the consultation phase. Members have been invited to give their views on the CP1588 via email and any late feedback can be considered at their January meeting when the ISG will be invited to come to a decision on CP1588.

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### SVG's initial views

At their meeting on 7 November 2023 ([273/06](#)), the SVG was invited to note the progression of the CP and provide any comments or additional questions for inclusion in the CP Consultation.

The committee made no further comments and did not provide any additional consultation questions.