



Issue 72

Ensuring measurement transformer
assets installed by a Non-BSC Party
are successfully Commissioned
within BSC timescales

24 January 2019

ELEXON

Health & Safety

In case of an emergency

An alarm will sound to alert you. The alarm is tested for fifteen seconds every Wednesday at 9.20am

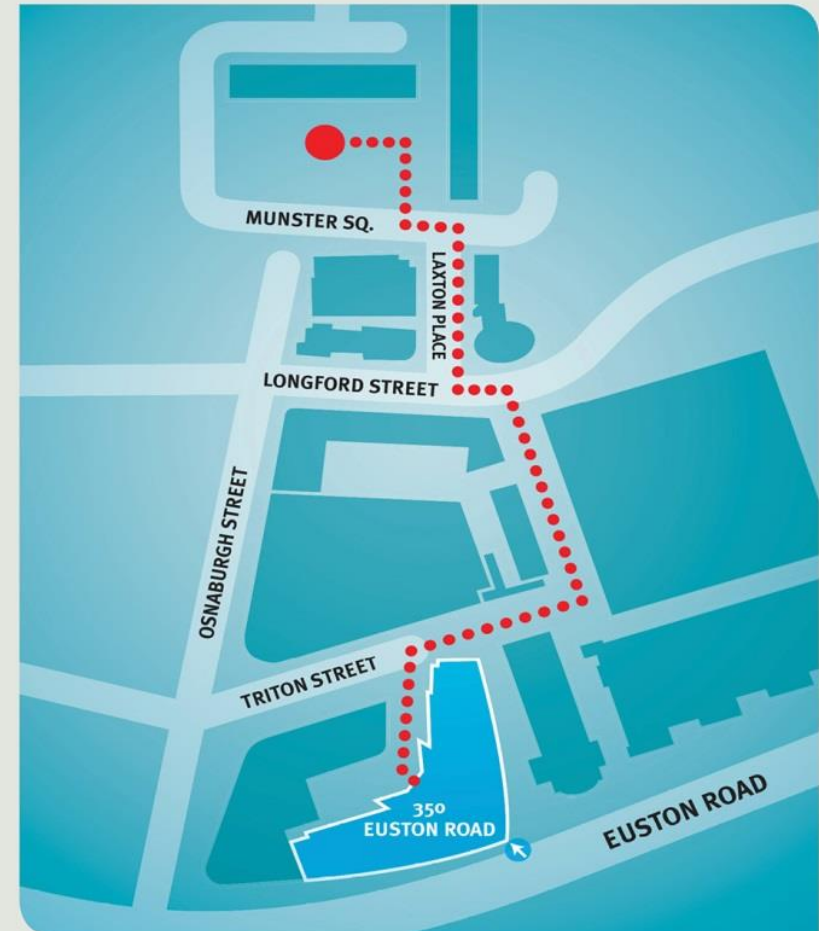
Evacuating 350 Euston Road

- If you discover a fire, operate one of the fire alarms next to the four emergency exits.
- Please do not tackle a fire yourself.
- If you hear the alarm, please leave the building immediately.
- Evacuate by the nearest signposted fire exit and walk to the assembly point.
- Please remain with a member of ELEXON staff and await further instructions from a Fire Warden.
- For visitors unable to use stairs, a Fire Warden will guide you to a refuge point and let the fire brigade know where you are.

When evacuating please remember

- Do not use the lifts.
- Do not re-enter the building until the all clear has been given by the Fire Warden or ground floor security.

Our team on reception is here to help you, if you have any questions, please do ask them.



Agenda

| Agenda item | Lead |
|---|------------------------|
| 1. Welcome & meeting objectives | Elliott Harper (Chair) |
| 2. Summary of first meeting | Ivar Macsween |
| 3. Review of actions and analysis | Workgroup |
| 4. Update on CiCCoP | Chris Day |
| 5. Issue as it relates to ICPs | Workgroup |
| 6. Issue as it relates to BNOs and customer-owned MTs | Workgroup |
| 7. Potential solutions to the Issue | Workgroup |
| 8. Next steps | Ivar Macsween |
| 9. Meeting close | Elliott Harper |

Meeting objectives

- Review the outcomes and actions from the first meeting;
- Cover any further areas of discussion relating to ICPs, BNOs and customer-owned MTs;
- Discuss potential solutions for Issue 72; and
- Agree next steps for progression.



Review of actions and analysis

Actions summary (1 of 2)

- ELEXON to investigate a potential gap in requirements for Commissioning information within CiCCoP or NERS.
 - Neither the CiCCoP or the NERS scoping document explicitly refers to the BSC Commissioning process.
 - Under the CiCCoP the LDSO is viewed as directly responsible for specifying which records are submitted as well as the timescales for doing so.
- ELEXON to contact CiCCoP regarding a response to the BSC Panel's letter dated 20 August 2018.
 - Contents of the letter had not previously been discussed. ELEXON representatives will attend CiCCoP Panel on 28 February 2019.
- ELEXON to review the current wording in CoP4 and how it interacts with clause 7.4 'Adoption' of the [CiCCoP](#).
 - Terminology in CiCCoP of "once the Connection Works are energised" could create ambiguity.

Actions summary (2 of 2)

- ELEXON to look into the risk to Settlement presented by BNOs.
 - Captured under Settlement Risk SR0116, describing a risk whereby the Import/Export Metering Systems are incorrectly installed or configured results in inaccurate data entering Settlement.
 - Probability of 4, Impact of 3 and control strength of Low. Therefore Net Significance of 12.
- Issue 72 group members to identify the extent of customer-owned equipment installed within their networks.
- ELEXON to ask the Performance Assurance Framework (PAF) whether materiality and real world impact were being considered under the PAF review.
 - “PAF designed the risk scoring methodology to forecast a realistic £ impact on Settlement in order for us to decide what mitigation is appropriate.”
- ELEXON to review the change process for modifications to CiCCoP.
 - Detailed in supporting Actions document.



CiCCoP update

CiCCoP Panel update

- Agreed action from Issue 72 Meeting 1: ELEXON to contact CiCCoP regarding a response to the BSC Panel's letter dated 20 August 2018.
- Letter sent to raise concerns of the PAB's concerns over lack of obligations on ICPs to complete Commissioning, and to pass Commissioning records on.
- ELEXON directly contacted CiCCoP representatives who confirmed that the contents of the letter and subjects of Issue 72 would be discussed at the CiCCoP Panel meeting on 12 December 2018.
- Agreed in correspondence to provide an account of the agenda item in minutes.
- Contents of the letter had not been previously discussed among the CiCCoP Panel.



**Further discussions
around the issue**

Issue as it relates to Independent Connection Providers

- Are there any further areas of discussion that members would like to raise following the outcomes of the analysis?
- From the first Issue 72 meeting (16 October 2018);
 - Bringing ICPs into the BSC as a Qualified Person would not be practical.
 - Discussion about ICP ownership and how LDSOs can ensure ICPs install and complete work compliantly through to energisation and Commissioning requirements.
 - Discussion whether ownership transfers to LDSO at point of energisation.
 - Heightened operational safety risks and need for accreditation for MOAs working on such sites.

Issue as it relates to Building Network Operators

- Are there any further areas of discussion that members would like to raise following the outcomes of the analysis?
- From the first Issue 72 meeting (16 October 2018);
 - A solution to issues related to the Commissioning of measurement transformers installed on a BNO operated network would also rectify issues related to customer-owned measurement transformers.
 - More complex than issue as it relates to ICPs.
 - On occasion it is physically difficult for the Registrant to correct a fault on a BNO network unless the BNO allows access.
 - Part of a larger industry-wide problem.

Issue as it relates to customer-owned MTs

- Are there any further areas of discussion that members would like to raise following the outcomes of the analysis?
- From the first Issue 72 meeting (16 October 2018);
 - A solution to issues related to the Commissioning of measurement transformers installed on a BNO-operated network would also rectify issues related to customer-owned measurement transformers.
 - Similar issues to those with BNOs exist, however better defined relationships present a better chance for rectification.
 - Difficulties in visibility of ownership of Metering Equipment.
 - Clarity sought as to scale of the problem within the industry.



Consideration of potential solutions

Potential solution (1 of 3)

- Clarify in CoP4 that LDSOs will be responsible for any connection installed by an Independent Connection Provider that will be later adopted by a BSC Party.
- This could be achieved by an amendment to CoP4 paragraph 5.5 'Commissioning'
- Progression via a Change Proposal (CP). Timescale of ~3 months to get a decision.
- Potential solution to the issue as it relates to ICPs.
- Would not address BNO and customer-owned MT issues.

Potential solution (2 of 3)

- Propose an amendment to CiCCoP:

“Once the Connection Works are energised, the DNO will adopt those network assets”

to

“On Energisation, the DNO will adopt those network assets”

- This could be achieved by a Modification Proposal to CiCCoP.
- Unclear timescales from raising the modification to approval by the Authority (BSC Modifications can take ~6 months to get a decision).
- Must meet CiC Code of Practice Objectives in order to progress.
- ELEXON do not have a remit over CiCCoP.
- Potential solution to the issue as it relates to ICPs.
- Would not address BNO and customer-owned MT issues.

Potential solution (3 of 3)

- Present the Issue group's discussions and findings to the Authority and seek a cross-Code solution/working group.
- Involves direct, ongoing coordination and communication between ELEXON, Electralink, ENA, Gemserv, National Grid, Ofgem etc.
- The approach and timetable would be agreed by each industry Code.
- Timescales could be lengthy. No guarantee of satisfactory resolution.
- Eventual solution would need to be progressed under each of the relevant codes and presented to respective industry Code panels for approval.
- Has potential to address issues as they relate to ICPs, BNOs and customer-owned MTs, although difficult to predict.

Summary of potential solutions

| | Potential Solution | Expected Lead Times | Codes Impacted |
|---|---|---|--|
| 1 | Amend CoP4 5.5 'Commissioning' via a BSC Change Proposal. | Around 3 months to reach decision from ISG and SVG Panel committees, including 1 month industry Consultation. | BSC |
| 2 | Propose an amendment to CiCCoP via CiC Modification Proposal. | TBD (BSC Modifications can take ~ 6 months to get a decision) | CiCCoP |
| 3 | Seek a cross-Code solution. | Difficult to predict. Approach and timetable would be agreed by each party. | Potentially OFGEM, ENA, BSC and MOCOPA |



Next steps

Issue 72 next steps

- ELEXON will conduct analysis as appropriate.
- ELEXON representatives will attend the next meeting of the CiCCoP on 28 February 2019 and feed discussions back to the Issue 72 group.
- We will gather potential dates for the next Issue group meeting at an appropriate time subject to analysis.
Or;
- ELEXON will present the Issue 72 paper at the next appropriate Panel meeting.