4.7 Issue Form

Issue Form - BSCP40/04	**Issue Number: 72** *(mandatory by BSCCo)*

Issue Title

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

Issue Description

Issue

We have identified several issues in the Commissioning process where Measurement Transformers installed by a non-BSC Party are not owned by the Licensed Distribution System Operator (LDSO). This results in the Meter Operator Agent (MOA) being required to complete the full Commissioning testing, which may not be practical or possible in the case of high voltage (HV) and extra high voltage (EHV) connections. The issues noted are:

- there is misalignment between the Commissioning of non-BSC Party owned measurement transformers process as outlined in Code of Practice 4 (CoP4) and certain industry operational processes. Where a measurement transformer is not commissioned by a MOA but rather the Commissioning is completed by a non-BSC Party (for example an Independent Connections Provider (ICP)), the MOA procures the Commissioning and Calibration records; either from the non-BSC Party or the LDSO on adoption. There is currently no BSC established procedure regarding this process and as such there are no clear requirements on the procurement of Commissioning and Calibration records from non-BSC Parties;

- in the majority of cases, the MOA does not possess the correct level of safety authorisation to complete Commissioning on HV or EHV connections. There does not appear to be an industry approach for MOAs being trained by LDSOs and subsequently holding the correct level of authorisation; and

- although it is the Registrant's responsibility to authorise the Metering System energisation, in some cases new connections have been found to be energised before the meter has been installed.

Background

Where the connection is at a HV, or EHV level, the MOA requires authorisation to complete the Commissioning of the Measurement Transformers. To work on this HV Metering Equipment, the network's operational safety rules require a safety document to be issued prior to work commencing, which states the processes that must be followed when working on their network (at all voltages). This aforementioned authorisation to work on HV or EHV connections is usually given to individuals rather than organisations and it appears LDSOs are generally reserved to authorise MOAs to work on their switchgear and substations.

We are not aware of a wide industry approach to get MOAs correctly trained by LDSOs and subsequently authorised to complete necessary Commissioning. In addition to the authorisation required, technical knowledge of the switchgear is crucial for completing Commissioning. Where measurement transformers are owned and Commissioned by a non-BSC Party, CoP4 envisions that Commissioning will be completed by the MOA. However, this process is not always followed at an operational level. The Commissioning is completed by the non-BSC Party (for example and Independent Connections Provider (ICP)) and following this the MOA procures the Commissioning and Calibration records; either from the non-BSC Party or the LDSO on adoption. This situation is not currently catered for in any BSC documentation relating to Commissioning and as such there are no clear requirements on the procurement of Commissioning and Calibration records from non-BSC Parties.

Under the Competition in Connections Code of Practice (CiCCoP) Independent Connector Providers (ICP) operate in the market to complete the contestable activities of connections. They do not own and operate the networks. Therefore, all new installed assets must be adopted by the Local Distribution Network Operator (LDNO). On this basis we think any workgroup discussions on this would benefit from participation by representatives from CiCCoP and Independent Distribution Network Operators (IDNOs) through the Energy

Network Association (ENA).

In some cases it has been reported that MOAs have visited sites to install Meters and found the supply to be live and energised. This poses a major risk to Settlement as the energy flowing to or from the Boundary Point is unmetered and so does not enter Settlement causing an imbalance. Furthermore the customer is receiving free energy (where the supply is an Import supply) and so is not being billed by the Supplier which may result in a large bill for the customer later down the line.

Although it is the Registrant's responsibility to request energisation, a third party connection provider will energise the supply once they have installed the measurement transformers as they may not be fully aware of the impacts and wider regulation involved in installations.

Justification for Examining Issue

We have seen the number of contestable installations by Non BSC Parties steadily increase. We contend that this trend has not been monitored by industry and intend to provide analysis for the Issue Group meetings. However, with the implementation of CP1496 'Introduction of two data flows for the Commissioning process for HH Supplier Volume Allocation (SVA) Current Transformer (CT) operated Metering Systems' in November 2018, and the requirement of the LDSO's to respond to the D0170 request from the MOA, we believe there should be a clearer understanding of the extent of the Issue.

The Registrant is required to ensure all Half Hourly (HH) Settlement Metering Systems are successfully Commissioned in accordance with Code of Practice 4 (COP) 'The Calibration, Testing and Commissioning Requirements of Metering Equipment for Settlement Purposes'. Where the measurement transformers are not owned by the Local Distribution System Operator (LDSO), the Meter Operator Agent (MOA) is required to complete the Commissioning of the measurement transformers. Some of the aforementioned issues are hindering this Commissioning process and we believe need discussing to ensure the integrity of Settlement through the Commissioning process.

Potential Solution(s)

We propose that this Issue is examined by an Issue Group, with the following initial suggested approaches:

- review Commissioning timescales, allowing for the LDSO to adopt assets;
- enable asset adoption by the LDSO prior to the installation of the Metering System (the Measurement Transformers are Commissioned and details passed to MOA);
- require non-BSC parties to have a contractual requirement with LDSOs to provide Measurement Transformer details within BSC timescales; and/or
- a Registrant only authorises Metering System Energisation after Measurement Transformer Commissioning details have been provided.

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