4.3 CP Form

Change Proposal – BSCP40/02	CP No: CPXXXX *Version No: 1.0* *(mandatory by BSCCo)*

Title (mandatory by originator)

Amend CoP4 to clarify BSC Party responsibility for the Commissioning of measurement transformers that will be later adopted into that BSC Party's ownership.

Description of Problem/Issue (mandatory by originator)

What is the Issue? (Summary)

There is a current 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.

This Change Proposal (CP) seeks to amend CoP4 to clarify that a BSC Party will be responsible for the Commissioning of any measurement transformers that will be adopted into that BSC Party's ownership at a later date.

Detail of the Issue and relation to Issue 72

Issue 72 'Ensuring measurement transformer assets installed by a Non-BSC Party are successfully Commissioned within BSC timescales' was raised by SSE Ltd on 11 September 2018, aiming to address issues in the Commissioning process where measurement transformers installed by a non-BSC Party are not owned by BSC Parties, hindering the end-to-end Commissioning process and threatening the integrity of Settlement.

As detailed in the Issue Report that captures the work of the Issue 72 group, members discussed how the obligations that CoP4 currently places on the Registrant via its appointed MOA for Commissioning of measurement transformers owned by non-BSC Parties are not always practical or possible to fulfil.

Discussions principally focused on issues faced in the Commissioning process when measurement transformer assets have been installed by ICPs, Building Network Operators (BNOs) or were owned by the customer. A solution to the issue as it relates to ICPs within the BSC was identified.

Among the issues caused by the aforementioned situations, members emphasised the heightened operational safety risks and the need for further accreditation for MOAs working on these sites.

In other cases, the CTs may not be accessible due to lack of authorisation or ability to contact the Equipment Owner.

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Additionally, the group highlighted that neither the Registrant nor the MOA has a commercial relationship with the ICP, so in the case of any issues arising with the Metering Equipment from installation, the Registrant is unable to ensure the ICP corrects the issues that it introduced at the site.

Similarly, as the ICP is not a BSC Party, ELEXON has no remit to hold them accountable for ensuring the Commissioning process is completed in line with CoP4, and reverts to the Registrant as the responsible party. This loop is circular as the Registrant is required to fix an issue that it did not introduce at the site.

Under the Competition in Connections Code of Practice (CiCCoP) ICPs 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 System Operator (LDSO).

It was noted that a solution to difficulties in obtaining Commissioning records within BSC timescales may rest on reviewing and utilising the lines of communication between Distribution Network Operators (DNOs), as BSC Parties, and ICPs as non-BSC Parties.

The Issue Group suggested an amendment to CoP4 clarifying BSC Party's (LDSOs in practice) responsibility for Metering Equipment that has been installed by ICPs, but that will later be adopted by that BSC Party would help to alleviate difficulties in obtaining Commissioning records within BSC timescales under the current provisions.

Background

Code of Practice 4' The Calibration, Testing and Commissioning Requirements of Metering Equipment for Settlement Purposes' (CoP4) describes the requirements for Commissioning Metering Equipment for Settlement purposes.

A Registrant is a Party to the BSC who registers Metering Systems in either the Supplier or Central Meter Registration Systems (SMRS or CMRS) and is responsible for it. The Registrant of the Metering System is responsible for ensuring all Metering Equipment is Commissioned and appoints a Meter Operator Agent (MOA) to ensure Commissioning is complete, and that overall accuracy is maintained in accordance with the relevant CoP.

Since the implementation of Modification Proposal P283 'Reinforcing the Commissioning of Metering Equipment Processes' on 6 November 2014 the responsibility for Commissioning new measurement transformers (in accordance with CoP4) sits with the Equipment Owner where they are a BSC Party (e.g. the Distribution or Transmission System operator).

Where the Equipment Owner is not a BSC Party (e.g. an Independent Connection Provider (ICP)) then the responsibility remains with the Registrant.

Therefore (where the Equipment Owner is not a BSC Party), it is up to the appointed MOA to ensure that all Commissioning is carried out in accordance with CoP4 under current arrangements.

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Proposed Solution (mandatory by originator)

CPXXXX seeks to amend CoP4 to clarify that a BSC Party will be responsible for the Commissioning of any measurement transformers that will be adopted into that BSC Party's ownership at a later date.

In practice, if measurement transformers are installed by an ICP and will later be adopted by an LDSO, the responsibility for ensuring Commissioning requirements are met would fall on the LDSO under the proposed CPXXXX solution.

It also clarifies that where measurement transformers are not, or will not be owned by a BSC Party, the Registrant, via its appointed MOA will be responsible for commissioning.

The proposed redlining for this CPXXXX can be found at attachment A to this proposal form.

The Issue 72 group believes this change will provide a greater degree of clarity and improve the provision of Commissioning records under BSC timescales. For the avoidance of doubt, ELEXON is acting as the Proposer of this CPXXXX on behalf of the Issue 72 group members.

Justification for Change (mandatory by originator)

Change Proposal CPXXXX proposes to create greater clarity for BSC Parties and improve the efficiency of the Commissioning process by:

- Providing clear instruction and reducing confusion amongst BSC Parties, with clear indication of expected responsibilities and obligations under the BSC;
- Making it easier to fulfil BSC obligations to provide Commissioning records;
- Improving industry confidence in the Commissioning process;
- Reducing the risk of involuntary BSC non-compliance;
- Reduce potential ambiguity within CoP4; and
- Enabling compliance with the BSC in line with current industry working practices.

This change was recommended as one of the conclusions from Issue 72 'Ensuring measurement transformer assets installed by a Non-BSC Party are successfully Commissioned within BSC timescales'.

To which section of the Code does the CP relate, and does the CP facilitate the current provisions of the Code? (mandatory by originator)

BSC Section L – Metering

Estimated Implementation Costs (mandatory by BSCCo)

£240 (one ELEXON Working Day) to implement the necessary CoP4 changes.

Configurable Items Affected by Proposed Solution(s) (mandatory by originator)

Code of Practice 4 'The Calibration, Testing and Commissioning Requirements of Metering Equipment for Settlement Purposes'

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Impact on Core Industry Documents or System Operator-Transmission Owner Code (mandatory by originator) As this change is to increase the practicality of obligations under the BSC only, other codes will not be impacted.
Related Changes and/or Projects (mandatory by BSCCo) Issue 72 'Ensuring measurement transformer assets installed by a Non-BSC Party are successfully Commissioned within BSC timescales'
Requested Implementation Date (mandatory by originator) To be confirmed.
Reason: To be confirmed.
Version History (mandatory by BSCCo) Version 1.0 of CPXXXX was raised on XX XXXX 2019.
Originator's Details:
BCA Name: Chris Day
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Date: XX/XX/2019
Attachments: **Y –** Proposed redlining changes **to CoP4**

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