

Assessment Procedure Consultation Responses

P375 'Settlement of Secondary BM Units using metering behind the site Boundary Point'

This Assessment Procedure Consultation was issued on 24 August 2020, with responses invited by 14 September 2020.

One confidential response was submitted. Their comments, nor name are not included in this document, but their views are added to the 'Yes', 'no' etc. sums for completeness.



Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Association for Decentralised Energy	One	Trade Body (Over 150 members, including suppliers and aggregators.)
Association of Independent Meter and Data Agents (AIMDA)	One	Trade Body for Supplier Agents (Meter Operator Agents, Data Collectors, and Data Aggregators – Half Hourly and non-Half Hourly)
Association of Meter Operators	One	Trade Body (35 Meter Operators)
Centrica	One	Generator, Supplier, and Virtual Lead Party
Decentralised Energy Trading Association (DETA) in Conjunction with Energy Managers Association (EMA)	Two	Trade Bodies
Drax BSC Parties (Opus Energy and Haven Power)	Two	Suppliers
E.ON Energy Solutions Ltd	One	Supplier and Supplier Agent
EDF	One	Generator and Supplier
Enel X	One	Virtual Lead Party
Flexitricity	One	Virtual Lead Party
IMServ Europe	One	Supplier Agent
NGESO	One	System Operator

P375
Assessment Consultation
Responses

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Version 1.0

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Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
RWE Supply & Trading GmbH	One	Generator, Supplier, Interconnector User, non-Physical Trader, ECVNA and Trade body
Salient Systems Limited	One	Software Systems Solutions Provider
Scottish Power	One	Supplier
Sembcorp Energy UK	One	Generator
Siemens	One	Supplier Agent
Smart Metering Systems (SMS)	One	Supplier Agent
Stark	One	Supplier Agent
Tonik Energy Ltd	One	Charge Point installer
Voltalis	One	Virtual Lead Party

Question 1: Do you agree that the content of CoP11 will enable the P375 solution?

Summary

Yes	No	Neutral/No Comment	Other
19	2	1	0

Responses

Respondent	Response	Rationale
Association for Decentralised Energy	Yes	The ADE believes that the content of CoP11 will enable the solution, for the reasons outlined in the consultation document.
Association of Independent Meter and Data Agents (AIMDA)	Yes	Yes, we agree that CoP11 will deliver P375.
Association of Meter Operators	No	<p>It has not been possible to review the draft CoP11 in any detail, reviewing a completely new CoP is not a trivial task.</p> <p>It is not clear why a new 'consolidated' CoP is required. The risk with creating a new CoP is the administrative overhead of ongoing changes. Any change to the CoPs will require multiple documents to be updated. This put an unnecessary burden on stakeholders.</p> <p>The draft CoP11 has different obligations to the existing BSC Metering CoPs. Therefore, in managing an apparently similar SVA Metering System vs. an Asset Metering System it will be necessary to ensure the correct CoP is considered. This means that transferring the Metering Equipment from, say a BSCP550 arrangement or an embedded Metering System to an Asset Metering System will require additional effort.</p> <p>The AMO have raised a BSC Issue proposing to realign the BSC Metering CoP thresholds to more pragmatic engineering thresholds such as replacing the 100kW threshold to be CT/whole current, and the CoP5/CoP3 threshold to be LV vs. HV.</p>
Centrica	Yes	We welcome that a new Metering standard is being developed to address asset metering. In order to unlock greater numbers and types of flexibility providers down to domestic level (for example

Respondent	Response	Rationale
		electric vehicles), we welcome that the Asset Metering Type 5 is being introduced.
DETA & EMA	Yes	It is essential that expected metering solution costs are commensurate with the potential scale of benefits generated from the services enabled. The use cases described in the consultation document envisage aggregation of relatively small-scale assets (e.g. domestic PV arrays or individual on-street EV chargers). Accessing these resources will be contingent on cost effective metering solutions being available.
Drax BSC Parties	Yes	<p>COP11 will facilitate implementation of P375 by ensuring that any Settlement Metering used conforms with agreed industry standards and requirements. We agree that, in the interest of efficiency and competition, in line with BSC Objectives b) and c), that COP11 should enable existing Settlement Metering to be used for P375 Settlement purposes but will also allow for other types of Metering to be used including Smart and Direct Current meters.</p> <p>It is important that in developing COP11, existing Meter manufacturers, industry members and future asset operators have been engaged, to help ensure that required industry standards are met.</p> <p>We support the Workgroup view that, to give Meter manufacturers certainty of what will be required, and to allow them time to bring new Meters to market with certainty, that CoP11 should be implemented ahead of the remainder of P375. This should help to support efficiency by asset owners/operators no longer installing operational Meters during the implementation phase that will not meet the CoP11 standard, thereby reducing the risk of stranded assets.</p>
E.ON Energy Solutions Ltd	Yes	We would like the definition of Import and Export to be more specific and potentially in line with the BSC wording. An MS being import and export can change between Import and Export but overall there is a Net definition of a site which should be reflective. We recommend similar wording as specified in COP9 3.9/3.10 which states Net position.
EDF	Yes	We agree that suitable metering enables the P375 solution.

Respondent	Response	Rationale
Enel X	Yes	CoP11 defines an adequate range of metering approaches to cover the P375 applications we can think of.
Flexitricity	Yes	CoP11 enables effective metering of the provision of balancing services at source (which is the goal of P375) with levels of accuracy and assurance which are appropriate to the size of the source concerned. This sensitivity to materiality within CoP11 enables the development of multiple new balancing resources without imposing burdens upon them which render those resources uneconomic. At the same time, CoP11 provides performance assurance in respect of these new resources, giving confidence to the market that volumes will be accurately reported – something which was not achieved within P344. This combination supports objectives (b) and (c). A deep market with many actors plus accurate measurement of delivery will increase efficiency of system operation and reduce prices through increased and more effective competition.
IMServ Europe	No	<p>IMServ can see the intent of CoP11 in that for larger assets, the metering arrangements replicate those of boundary metering. However, once the asset size is below 100kW, the requirements become more open, perhaps vague in places, and we are concerned that the freedom that these rules create will cause accuracy and interoperability issues that may damage the burgeoning market. For example, it is not clear exactly how meter protocol approval will be verified and obtained for these smaller asset meters, or how data is exchanged between the HHDC and another party collecting/assembling the data, or how qualification/assurance will be passed across this interface. There is specific detail missing in these areas that is required to make CoP11 fully suitable as a solution to P375.</p> <p>Section 6.1.4.2 states "...The metered data of the Asset Meter must be monitored by the Half Hourly Data Collector or operator of the Data Retriever Instation, as applicable, for inconsistencies with the data. For example, inconsistencies such as frozen Modbus values or long periods of zero values." Is this consistent with COPs1 to 10? If not, why is it included here, this sort of activity is usually covered by BSCP502.</p> <p>Section 6.1.5 We suspect, based on previous history that the following will not be adhered to "Any default password programmed into an Asset Meter</p>

Respondent	Response	Rationale
		<p>must be changed at the time of installation.” Is this actually going to be enforced/monitored or should these words be removed?</p> <p>Section 9 Commissioning and Proving</p> <p>Currently for HH metering Proving test are only required for meters which utilise pulse multipliers and complex metering systems (CoP4 references BSCP514 / BSCP02). We would expect the same proving test rules to be applied to asset meters, as it stands it reads like all asset meters will require proving tests.</p> <p>Is Section 12.1.u suggesting that all levels of password will be shared across Parties or simply that the Asset MOP needs to record and store all levels of password. We think the latter but would suggest the wording isn't clear.</p> <p>Are the diagrams in Appendix A an exhaustive list of configurations allowed or just a sample set? Could this be made clear please?</p> <p>Some of the data items being stored by the Asset Meter seem a bit over-engineered such as Cumulative MD and number of MD resets, why are these included?</p> <p>Appendix 3 section C – is this aligned with the revised storage periods quoted in CP1527?</p> <p>Asset Metering Complex form – how does this compare with the preferred form being proposed by the issue 88 group, i.e. is it consistent?</p> <p>In addition to the above, there remain numerous outstanding questions regarding the detail of CoP11, which we expect will be debated, agreed and clarified by one of the P375 working groups.</p> <p>Given the Asset meter isn't particularly likely to be close to the Boundary meter, this suggests that most AMSIDs would need to be uplifted to account for losses either by a factor or compensation, is this correct? This doesn't seem right to ignore these losses (contrary to the Group's discussions).</p>
NGESO	Yes	<p>Yes, we believe it is important that CoP11 is developed to support the delivery of P375 and we believe the content of CoP11 is sufficient for the P375 solution. We'd also like to acknowledge that CoP11 is only applicable for the purposes of the BSC and settlement so other requirements (e.g.</p>

Respondent	Response	Rationale
		balancing services) may require different/additional a metering specifications.
RWE Supply & Trading GmbH	Yes	We agree that the content of CoP11 will enable the P375 solution.
Salient Systems Limited	Yes	The new Cop, together with an extended BSCP601, will contribute positively to the successful delivery of P375 solution.
Scottish Power	Yes	No comment provided
Sembcorp Energy UK	Yes	No comment provided
Siemens	Yes	No comment provided
Smart Metering Systems (SMS)	Yes	Overall, we agree that CoP11 will deliver P375, however, there remains some uncertainty over how the latest second-by-second operational meter readings will be synchronised within the half hourly settlement and balancing mechanism. In line with the BSC objectives to promote innovation within the industry, particularly within flexibility services, SMS would support CoP11 providing additional clarification on the future use of the latest real-time data. This will help support development of additional opportunities within the sector, while futureproofing the code to support the latest technologies.
Stark	Yes	As detailed in the draft document, CoP11 facilitates the means that almost any type of energy flow measurement device could become an asset meter – so long as they meet the minimum requirements. It is an important consideration that asset metering be subject to assurance of a standard that is aligned with current settlement protocols and sets out a standard that ensures compatibility with industry participant systems. As agreed, the provisions provided by COP11 will facilitate BSC objectives (b), (c) and (e)
Tonik Energy Ltd	Neutral	No comment provided
Voltalis	Yes	Voltalis wishes to thank Elexon for this consultation. The ability to use metering beyond the boundary point is absolutely necessary to enable aggregators of small assets to participate in the Balancing Markets, and facilitate residential Demand Response.

Respondent	Response	Rationale
		<p>Such regulation is also needed for aggregators to access other markets, such as the wholesale day ahead markets (as it is already the case in France for instance). Those markets are key for residential Demand Response aggregators. As sustainable revenue streams are therefore made available to these aggregators, new and much needed sources of flexibility for the power systems are unlocked.</p>

Question 2: Have we considered all potential Metering types in drafting CoP11?

Summary

Yes	No	Neutral/No Comment	Other
17	1	4	0

Responses

Respondent	Response	Rationale
Association for Decentralised Energy	Yes	The ADE believes that all potential Metering types have been considered in the drafting.
Association of Independent Meter and Data Agents (AIMDA)	Yes	Yes. It is important to emphasise that Cop11 must cover all types and combinations of existing smart and advanced meter infrastructure to minimise the need for replacements to deliver P375. We believe that the drafting of CoP11 has taken this into account.
Association of Meter Operators	No	The MID applies to all metering equipment used for billing – that does not just include settlement meters, but all meters used for billing (e.g. tenants). The MID places obligations on the provision of displays, access to displays, etc. it is not clear whether the draft CoP11 reflects all these requirements
Centrica	Yes	No comment provided
DETA & EMA	Neutral	No comment provided
Drax BSC Parties	Yes	In line with our response to Q1, we agree that P375 should allow for all of the potential Metering types listed, including Smart and Direct Current meters. This will help to open the market to as many new participants as possible.
E.ON Energy Solutions Ltd	Yes	Based on current metering set ups then they have been accounted for, however does their need to be restrictions regarding Boundary meters that are in a Prepayment mode and a process should they be remotely reconfigured.
EDF	Yes	No comment provided
Enel X	Yes	It seems comprehensive. The ability for embedded asset meters not to have a display is particularly welcome.

Respondent	Response	Rationale
Flexitricity	Yes	<p>Balancing services provided by industrial, commercial or public sector organisations are often drawn from complex sites, where the behind-the-meter problem identified in Issue 70 is present. It is Flexitricity's experience that assets at such sites fall within Metering Types 1-4 set out by CoP11. Sourcing meters for these types in the existing market is straightforward.</p> <p>The main category of asset which is not covered within these types is the growing area of "energy smart appliances" (using BSI terminology), principally EV chargers, home heating systems and domestic batteries. These are catered for under Metering Type 5. Manufacturers of energy smart appliances urgently need a clear statement of the requirements to which their products must conform, as such products are already being installed and the risk of stranded assets is high. CoP11 (and its early implementation) deals with this problem.</p> <p>It is possible that other categories of asset may emerge with different requirements, which might justify extension of CoP11 in the future. There is at present nothing substantial on which to base an additional metering type</p>
IMServ Europe	Yes	No comment provided
NGESO	Neutral	We do not believe we are best placed to answer this question and would defer to other industry participants.
RWE Supply & Trading GmbH	Neutral	CoP11 facilitates the development new metering solutions to address the opportunities in this emerging market. CoP11 creates a framework for further innovation in metering and settlement for behind the meter assets.
Salient Systems Limited	Yes	Cop11, complemented by BSCP601, should together provide effective vehicles going forward to accommodate the identification of appropriate metering types that will meet the requirements of the P375 solution.
Scottish Power	Yes	We believe Metering types have covered all dated capacities
Sembcorp Energy UK	Yes	No comment provided
Siemens	Yes	No comment provided

Respondent	Response	Rationale
Smart Metering Systems (SMS)	Yes	<p>As noted in question 1, additional consideration of the latest second-by-second operational metering technologies would be welcome.</p> <p>In addition, it is important to emphasise that Cop11 must cover all types and combinations of existing smart meter infrastructure to minimise the need for replacements to deliver P375. This must include both SMETS1 and SMETS2 and split sets, such as where an early smart meter monitors the main supply, supported by a more modern sub-meter.</p>
Stark	Yes	<p>We agree that the draft COP11 document has taken into consideration all current types of metering as possible, accounting for currently available technologies, schemes, projects & potential uses of an asset meter.</p>
Tonik Energy Ltd	Neutral	No response
Voltalis	Yes	<p>Voltalis views that type 5 meters considered in CoP11 can be used by residential Demand Response aggregators to provide reliable metering data.</p> <p>Such meters are already used successfully at scale in France for the participation in the balancing, wholesale, ancillary services, and capacity markets.</p>

Question 3: Do you agree that no particular provision shall be made for smart Meters and pre-payment Meters?

Summary

Yes	No	Neutral/No Comment	Other
15	3	4	0

Responses

Respondent	Response	Rationale
Association for Decentralised Energy	Yes	The ADE agrees with this approach – it is sensible to design the CoP to allow for smart meters to be used as asset meters if the VLP wishes to but not to mandate they be used. As such, no particular provision should be made. With regard to pre-payment meters, the ADE agrees that it should be possible to use them as asset meters, with VLPs aware of risk and potential costs arising from failure to deliver.
Association of Independent Meter and Data Agents (AIMDA)	Yes	Overall, we support the CoP11's approach, however, we would welcome additional guidance from the code on the mechanism for sharing smart meter data with Virtual Lead Parties (VLPs) and independent aggregators in the same format as network operators. This would be key to removing barriers to entry to the aggregation market, promoting enhanced competition and innovation. This would in turn support the delivery of BSC objectives of promoting efficient network balancing, while accelerating the decarbonisation of the UK economy through more rapid cost-effective connection of low carbon technologies.
Association of Meter Operators	No	Smart and prepayment meters are only whole current. It may be appropriate to constrain P375 to CT metering only.
Centrica	Yes	We agree, it does not seem necessary to include a particular provision.
DETA & EMA	Neutral	No comment provided
Drax BSC Parties	Yes	CoP11 will allow for existing Settlement Metering to be used for P375 Settlement purposes but will also allow for other types of Metering to be used. Because CoP11 has been designed to allow for Smart meters to be used as asset meters - should the Virtual Lead Party (VLP) wish - we agree that

Respondent	Response	Rationale
		<p>there is no need for a particular provision for smart Meters.</p> <p>CoP11 has been designed to allow for Smart meters and Pre-Payment Meters to be used as asset meters - should the VLP wish - which is supportive of BSC Objectives b) and c).</p>
E.ON Energy Solutions Ltd	No	The end consumer can request a movement into a Prepay method of payment. We believe for simplicity these should be excluded from these arrangements.
EDF	Yes	No specific provisions would need to be made in CoP11 for smart metering
Enel X	Yes	Only the relevant functionality needs to be specified.
Flexitricity	Yes	<p>Smart meters and pre-payment meters describe categories of boundary meters. Because P375 is expected to be used by VLPs, half-hourly metering is essential, and so any boundary meter at a domestic property which participates in P375 must be a smart meter; whether or not it is pre-payment does not affect P375 or the choice of asset meter.</p> <p>Any metering hardware which meets the requirements of CoP11 for the asset concerned can be deployed as an asset meter. It is therefore possible that a VLP might choose to use a SMETS-capable meter as an asset meter. Equally, the VLP might choose a different meter conforming to CoP11 in other ways.</p> <p>In order to participate in BM Wider Access, the site concerned must already have a SMETS meter if a domestic (or microbusiness) property or a half-hourly meter if not. P375 and CoP11 do not change this requirement.</p>
IMServ Europe	No	<p>It is unclear how Smart meters can be included in the scope of this modification.</p> <p>How is it envisaged that data from a smart meter would reach SVAA? How would such an AMSID be known to DCC, as it would not exist on any other registration system other than AMR, so how could DCC collect it?</p> <p>Or by smart Meter do you just mean a SMETS meter that isn't connected to the DCC but does have</p>

Respondent	Response	Rationale
		remote communication functionality, so an advanced meter by another name?
NGESO	Neutral	We do not believe we are best placed to answer this question and would defer to other industry participants.
RWE Supply & Trading GmbH	Yes	We agree that no particular provision is required for smart meters or prepayment meters. The P375 arrangements are designed to be compatible with all forms of boundary meters, and the boundary metering arrangements should not form a barrier to entry for asset metering.
Salient Systems Limited	Yes	No comment provided
Scottish Power	Neutral	No comment provided
Sembcorp Energy UK	Yes	We support the WG conclusion that smart meters could be voluntarily elected for the purpose of P375. We agree with the intention not to mandate their use. We also agree that the potential use of pre-payment meters should be left at the discretion of VLPs, who take the responsibility of potential failure to deliver.
Siemens	Yes	No comment provided
Smart Metering Systems (SMS)	Yes	Overall, we support the CoP11's approach, however, we would welcome additional guidance from the code on the mechanism for sharing smart meter data with Virtual Lead Parties (VLPs) and independent aggregators in the same format as network operators. This would be key to removing barriers to entry to the aggregation market, promoting enhanced competition and innovation. This would in turn support the delivery of BSC objectives of promoting efficient network balancing, while accelerating the decarbonisation of the UK economy through more rapid cost-effective connection of low carbon technologies.
Stark	Yes	<p>Agree that there should be no particular provision for smart & pre-payment meters as discussed in consultation, as CoP11 allows for smart Meters to be used as asset meters should the VLP choose to do so, with no obligations.</p> <p>The use of asset metering is a commercial choice. The VLP will decide what metering solution best suits each individual site; not mandating the use of</p>

Respondent	Response	Rationale
		<p>Smart meters allows for increase in flexibility of potential assets fulfilling competitive objective.</p> <p>There will be no provision for prepayment Meters failing mid-Settlement period – the VLP will be aware of the risk and any costs associated from failure to deliver should be considered when electing to use prepayment Meters.</p>
Tonik Energy Ltd	Neutral	No response
Voltalis	Yes	No comment provided

Question 4: Do you agree that DC measuring devices should be allowed to be used and that inverter losses should be accounted for?

Summary

Yes	No	Neutral/No Comment	Other
15	1	6	0

Responses

Respondent	Response	Rationale
Association for Decentralised Energy	Yes	Allowing DC measuring devices to be used enables the solution to apply to the widest possible range of assets. As DC meters will not be used for customer billing, this approach is consistent with current use.
Association of Independent Meter and Data Agents (AIMDA)	Yes	As highlighted in response to question 2, we agree with the principal that as wide a range of existing smart and advanced meter devices should be incorporated into Cop11's approach to minimise any additional costs or interventions to replace existing metering infrastructure.
Association of Meter Operators	No	The metering equipment should always be installed at the actual point of measurement. If the demand is being measured as a DC measurement it is at that point. If there is requirement to measure the ac energy of a inverter then measure it at the ac point that is required to be measured. It is not appropriate to seek to 'estimate', 'guess' or otherwise deem losses.
Centrica	Yes	This seems sensible to allow wide participation in the mechanism.
DETA & EMA	Neutral	No comment provided
Drax BSC Parties	Neutral	We have no comments at this time.
E.ON Energy Solutions Ltd	Yes	There needs to be clear identification of DC measuring devices and if there is a difference in measurement (Boundary is WC and Asset is DC) then there needs to be a consistent measurement for Settlements so all volume is converted to WC. This should be outlined in the COP to future proof the change.
EDF	Neutral	No comment provided
Enel X	Yes	This could prove important, particularly for systems with battery storage. The DC measurements could be used for direct measurement of asset

Respondent	Response	Rationale
		performance, or as an input to a difference metering arrangement.
Flexitricity	Yes	<p>BSC objectives (b) and (c) rely on competition, which relies on market depth. There are already situations where on-premises distribution is considered to be more efficient if done using DC than AC: datacentres and multiple EV charging stations are two examples, and some heavy industry also makes use of DC loads. In order to future-proof P375 and CoP11, it is prudent to allow DC measuring devices to be used.</p> <p>In sites with DC distribution, inverters (subject to resolution of the terminology point below) play an analogous role to transformers. Inverter losses are losses, and should be accounted for in the same way as transformer losses. This is provided for in CoP11 and P375.</p> <p>We note one issue with the drafting of this aspect of CoP11: the word “inverter” is used where “inverter/rectifier” may be more appropriate. An inverter converts DC to AC, such as in vehicle-to-grid (V2G) applications, while a rectifier converts AC to DC, such as in normal EV charging. The drafting of CoP11 clearly presumes DC load whereas the word “inverter” implies a DC power source. We suggest that the generality of the solution, catering for bidirectional flow, is clarified by substituting “inverter/rectifier” for “inverter”.</p>
IMServ Europe	Yes	No comments provided
NGESO	Neutral	We do not believe we are best placed to answer this question and would defer to other industry participants.
RWE Supply & Trading GmbH	Neutral	The P375 arrangements should allow for innovation in asset metering systems. In this context new metering devices (including DC measuring devices) should be permitted provided that the integrity of the settlement systems can be maintained at all times, including in this context the accounting for the losses associated with the operation of the metering devices (including inverter losses).
Salient Systems Limited	Yes	No comment provided
Scottish Power	Yes	We agree, potential savings and technical advantages can be made by co-locating of converter

Respondent	Response	Rationale
		based assets (battery storage, solar) via DC solutions and avoid AC equipment.
Sembcorp Energy UK	Yes	Allowing DC inverter meters will open the possibility to a wider range of capable providers to participate in the BM via a VLP. This will favour competition.
Siemens	Yes	No comment provided
Smart Metering Systems (SMS)	Yes	As highlighted in response to question 2, we agree with the principal that as wide a range of existing smart meter devices should be incorporated into Cop11's approach to minimise any additional costs or interventions to replace existing metering infrastructure.
Stark	Yes	From working group discussion & as detailed in consultation it was determined that as DC Metering would not be used for customer billing in the P375 proposal it would be consistent with objectives, to allow use of these devices; provision having also been provided for in COP11.
Tonik Energy Ltd	Neutral	No response
Voltalis	Yes	We see no reason to exclude DC measuring devices.

Question 5: Do you agree that asset meters should only be assigned to a single SBMU at any one time?

Summary

Yes	No	Neutral/No Comment	Other
19	1	2	0

Responses

Respondent	Response	Rationale
Association for Decentralised Energy	Yes	No comment provided
Association of Independent Meter and Data Agents (AIMDA)	Yes	We support a parent and sub-metering model, with asset meters for individual devices assigned individual MPANs beneath a single SBMU. This would support innovation within the energy supply market, such as individual energy tariffs for technology classes – such as heating or EV charging as a service – which would support the deployment of these technologies. This model will also enable more accurate and granular data upon energy consumption and production, creating greater certainty for aggregator service providers and network balancing.
Association of Meter Operators	Yes	This approach is complex enough as proposed
Centrica	Yes	At this time, this is a sensible approach. As the system decentralises further, with greater consumer participation, it may be worthwhile considering this in the future.
DETA & EMA	Yes	Whilst there is potential for a use case whereby assets could be aggregated into different SBMUs to provide varying services at different times. It seems likely that costs of managing switch over between SBMUs to avoid double allocations would outweigh the benefits given the scale of assets being considered.
Drax BSC Parties	Yes	We agree that asset meters should only be able to be assigned to a single Secondary BM Unit (SBMU) at any one time, and that by so doing, this does not place unnecessary restrictions upon the delivery of balancing services from aggregators. Assigning asset meters to multiple SBMUs at the same time runs the risk of double-counting, double-payment and working out which aggregator

Respondent	Response	Rationale
		delivered what at any particular time, and would require additional system changes.
E.ON Energy Solutions Ltd	Yes	For simplicity of this process we need to understand where volume is being allocated and this would be easier using a 1-2-1 relationship.
EDF	Neutral	No comment provided
Enel X	No	<p>The purpose of asset metering is to measure the throughput of particular assets. Each asset can only belong to a single SBMU at any one time. However, a single customer site (behind a single boundary point metering system or group of boundary point metering systems) may contain several such assets, which could be in different SBMUs, maybe belonging to different VLPs.</p> <p>Where difference metering is used, it may be that the aggregation rule to measure the asset in one SBMU requires as an input (e.g. as one of the items to be subtracted from the readings from the boundary point metering system) the measurements from the asset meter for the asset in the other SBMU.</p> <p>While these circumstances are not covered in the examples in CoP11, or in the text of this question, clause K.8.1.2(d) in the draft legal text seems to allow for this possibility, so it may be that no changes are needed to accommodate these use cases.</p>
Flexitricity	Yes	<p>Asset meters are submeters, that is, they gain their context from the site's boundary meter, and measure a subset of the boundary meter flows. A boundary meter can only be assigned to a single BMU (being a base BMU or additional BMU) at any one time. Analogously, it is logical for an asset meter to be assigned only to one SBMU at any one time.</p> <p>The only caveat to this single assignment point is differencing, a facility provided in P375 for asset meters and already available in the BSC for boundary meters. The draft P375 legal text provides for differencing while preserving the one-to-one correspondence between meters and BMUs (or, more precisely, between MPANs/AMSIDs and BMUs), just as the current BSC does for boundary meters.</p>

Respondent	Response	Rationale
		If an asset meter were to be assigned to more than one SBMU at a time, it is unclear where asset metered volumes should be assigned. We note that "meter splitting" is currently under consideration under a separate BSC modification proposal (P379). If it is demonstrated that meter splitting has value for boundary meters, then it might be necessary to devise a means to do it for asset meters. However, that falls into the scope of P379. Meter splitting is not within the scope of P375, and therefore assignment of asset meters to multiple SBMUs should not be provided for within P375.
IMServ Europe	Yes	No comment provided
NGESO	Yes	Yes, we believe there should be a 1-to-1 mapping between asset meters and the SBMU they are registered to, this is to avoid complications and difficulties in assigning the energy volumes from the asset meter to the appropriate SBMU. We'd also note that this solution doesn't prevent multiple asset meters at the same site (i.e. behind the same boundary meter) being registered to the same or multiple SBMUs, as long as the 1-to-1 relationship between an asset meter and a SBMU is maintained.
RWE Supply & Trading GmbH	Yes	We agree that asset meters should only be assigned to a single SBMU at any one time. It is essential that the arrangements treat the asset metering systems in a manner that replicates those associated with Boundary Meters.
Salient Systems Limited	Yes	No comment provided
Scottish power	Yes	No comment provided
Sembcorp Energy UK	Yes	This approach would facilitate the efficient, economic and co-ordinated operation of the system
Siemens	Yes	It is our understanding that assigning meters to single SBMUs at any one time avoids any unnecessary complexities in the settlement of these meters and enables sufficient flexibility in the sub-metering market.
Smart Metering Systems (SMS)	Yes	We support a parent and sub-metering model, with asset meters for individual devices assigned individual MPANs beneath a single SBMU. This would support innovation within the energy supply market, such as individual energy tariffs for technology classes – such as heating or EV charging as a service – which would support the deployment

Respondent	Response	Rationale
		of these technologies. This model will also enable more accurate and granular data upon energy consumption and production, creating greater certainty for aggregator service providers and network balancing.
Stark	Yes	As Secondary BM Units record the amount of Balancing Energy provided by VLP's to the NETSO as a Balancing Services Provider & provide a mechanism for aggregated BMUs to submit accurate predicted generation profiles (PNs). This is preferable for grid accuracy & BSC objective (b).
Tonik Energy Ltd	Neutral	No comment provided
Voltalis	Yes	Asset meters can be assigned to a single SBMU provided that it is still possible for an aggregator to: <ul style="list-style-type: none"> - Easily and frequently (daily) change the SBMU to which a site is linked - participate in other markets, such as the capacity market, local flexibilities for DSO and ancillary services with units registered under one SBMU <p>To our knowledge, the assignation of asset meters to a single SBMU at any one time does not conflict with these conditions.</p>

Question 6: Do you agree that asset meters should only be assigned to a single GSP Group at any one time?

Summary

Yes	No	Neutral/No Comment	Other
20	0	2	0

Responses

Respondent	Response	Rationale
Association for Decentralised Energy	Yes	No comment provided
Association of Independent Meter and Data Agents (AIMDA)	Yes	As noted in response to question 5, centralising asset meters into a single grid supply point is consistent with the parent and sub-metering model, unlocking significant benefits for both individual customers, the energy industry, and wider UK society. Though we suggest that a mechanism for assigning asset meters to multiple GSP Group be considered for future proofing purposes.
Association of Meter Operators	Yes	Settlement and GCCF are determined on a GSP Group basis so that is essential if not basic.
Centrica	Yes	This is aligned with the current functioning of the settlement system and BM participation is currently limited to GSP Group.
DETA & EMA	Yes	This is consistent with producing useful aggregated services at the scales envisaged
Drax BSC Parties	Yes	<p>We agree with the Workgroup view that asset meters should only be assigned to a single GSP Group at any one time. This is in line with P344, for which it was agreed that when a VLP completes the registration process they are assigned one SBMU per GSP Group.</p> <p>With asset meters only assigned to a single GSP Group at any one time, the solution will allow Settlement of the Balancing Service to use both metering installed at the asset with volumes adjusted by Line Loss Factors up to the GSP (equivalent of Boundary Point volumes) and Boundary Point meters.</p> <p>The current system is set up with a BMU for a GSP Group. A national BMU, rather than a regional BMU,</p>

Respondent	Response	Rationale
		is beyond the original scope of the proposal and would require significantly more system changes.
E.ON Energy Solutions Ltd	Yes	Although we do agree that the asset is attributed to a single GSP there should be no restrictions on the exported volume.
EDF	Neutral	No comment provided
Enel X	Yes	It seems a simple question of their location
Flexitricity	Yes	<p>Asset meters are for the metering of assets, which are in fixed locations within a GSP Group. It is therefore not logical to allow an asset meter to sit within more than one GSP Group. To do so would be counter to BSC objectives (b) and (d).</p> <p>There is one possible future scenario, specific to EVs, where this correspondence might be broken. This is in the concept of in-cable or in-vehicle metering, where something analogous to the MPAN would travel with the vehicle. This is out of scope for P375.</p>
IMServ Europe	Yes	<p>Yes, on the basis of a fixed asset location, else no.</p> <p>Is this actually defined in the Proposal, i.e. that Asset meters have to have a fixed location, else could this be made clear? So, for example a measurement device that travels with an EV is out of scope for P375.</p>
NGESO	Yes	Yes, we believe this is a sensible validation step.
RWE Supply & Trading GmbH	Yes	We agree that asset meters should only be assigned to a single GSP Group at any one time. It is essential that the arrangements treat the asset metering systems in a manner that is similar to those associated with Boundary Meters.
Salient Systems Limited	Yes	No comment provided
Scottish Power	Yes	This seems a sensible approach
Sembcorp Energy UK	Yes	This approach would facilitate the efficient, economic and co-ordinated operation of the system
Siemens	Yes	No comment provided
Smart Metering Systems (SMS)	Yes	As noted in response to question 5, centralising asset meters into a single grid supply point is consistent with the parent and sub-metering model, unlocking significant benefits for both individual

Respondent	Response	Rationale
		customers, the energy industry, and wider UK society.
Stark	Yes	<p>The SVAA shall adjust Half Hourly metered data for GSP Group Correction using the GSP Group Correction Factor and GSP Group Correction Scaling Weight calculated by the SVAA for each Half Hourly SVA Metering System Number.</p> <p>HHDC sends Metered Data to SVAA and the SVAA will apply the Line Loss Factors to adjust for losses to GSP level.</p>
Tonik Energy Ltd	Neutral	No response
Voltalis	Yes	While we have no issue with asset meters being assigned to a single GSP group at any one time, we would like to highlight that for aggregators of small flexibilities, GSP Groups may limit access to market, as a larger number of units will be required in each GSP Group to enter the market.

Question 7: Do you agree with the Registration process?

Summary

Yes	No	Neutral/No Comment	Other
17	2	3	0

Responses

Respondent	Response	Rationale
Association for Decentralised Energy	Yes	No comment provided
Association of Independent Meter and Data Agents (AIMDA)	Yes	We support the registration process outlined within the draft BSC procedure. Our preferred method of Agent appointment would be via the DTN.
Association of Meter Operators	No	<p>The metering equipment should be installed and proven to be working before the associated metering system is allowed to trade.</p> <p>There is no mention of de-appointments. This need capturing.</p> <p>The Meter Operator should be able to obtain a list from the SVAA on request of all the metering systems for which they are registered to. The SVA and CVA arrangements have demonstrated a regular disparity between the appointments held on the registration system and the actual agents view.</p>
Centrica	Neutral	There is insufficient detail in the documents to provide a considered response. The industry experts group therefore is important to determine the details on this. We would like to be involved and we suggest cross code representation.
DETA & EMA	Yes	With the caveat again that costs incurred are commensurate with the scale of revenues being generated. Also, the registration process should aim for inclusivity rather than exclusivity whilst maintaining the integrity of the marketplace.
Drax BSC Parties	Yes	The Registration process developed by the Workgroup is logical because it follows the same sequence, as far as practicable, as the sequence for registering a Supplier Volume Allocation (SVA) Boundary Point Meter – e.g. MOA and HHDCs will be appointed prior to the meter being commissioned.

Respondent	Response	Rationale
E.ON Energy Solutions Ltd	Yes	No comment provided
EDF	Neutral	No comment provided
Enel X	Yes	It looks like it should work
Flexitricity	Yes	We believe the Registration process respects and preserves the integrity and coherence of the BSC and its systems and processes, assigns roles appropriately, and is capable of being implemented without imposing unnecessary burdens on VLPs or other Parties.
IMServ Europe	No	<p>Most of the registration activity is adequately described but some areas are unclear. It has been unhelpful that the process is split across so many documents with some details only being described under the definitions section.</p> <p>Where the registration process section suggests "Further detail is in the proposed changes to the Code Subsidiary Documents (CSDs) included in this consultation" it should be made clear that not all CSD are available at this time.</p> <p>Therefore, we can only give an initial view, that in principle most of the high level steps required seem reasonably sensible and that we await further details as they become available.</p> <p>We have had to assume that a new role and role code supporting VLPs will need to be created to allow registration to take place? This would also have consequential changes on the DTN in terms of which roles can send and receive flows, e.g. appointment flows. We don't see such a role defined in the DTC at the moment.</p> <p>Why isn't this registration data being held within the industry's registration systems, wouldn't this be better than a standalone bespoke system?</p> <p>BSCP602 suggests that AMSIDs will be added to the SVA Metering System Register (Section 2.1.6) but I thought a separate register called the Asset Meter Register was being proposed, please clarify. This contradiction also occurs in the legal text.</p> <p>Are we correct in thinking that AMSID will be 13 digits in length and contain a check digit, akin to MSIDs? Will it have any relationship to the GSP it is connected to?</p>

Respondent	Response	Rationale
		<p>We would have thought that the VLP should not inform the SVAA who the Agents are until the VLP has received acceptance flows back from those Agents? Wouldn't this be safer/more robust? Or is this activity being deliberately omitted from BSCP602 as it will be captured in BSCP502 and 504? We would think that some reference should be made to this activity in BSCP602 though.</p> <p>If this modification supports the use of Smart meters, isn't it the intention that Smart meters are covered by the REC?</p> <p>Can you confirm the de-appointment process, specifically who tells the old HHDC to stop on loss of appointment?</p>
NGESO	Yes	Yes, we believe it is prudent for the registration of Asset Meters to follow a similar, existing process that is well understood.
RWE Supply & Trading GmbH	Yes	We agree with the Registration process. The registration process for asset meters should, as far as possible, replicate the process for boundary meters.
Salient Systems Limited	Yes	Generally we agree with the Registration process outlined at the Assessment Procedure Consultation and at the Business Requirements descriptions. However, at this stage we interpret the available Business Requirements statements as fairly high level 'proposals' only; a legitimate interpretation that is indeed also stated clearly within a number of the individual requirements statement descriptions themselves. We will expect that further scrutiny and refinement of Business Processes will follow this Assessment phase, alongside the exercise proposed at Q23 – Industry expert input to detailed development/refinement of CSD's.
Scottish Power	Yes	We agree, although we would welcome clarity on the timescales for the registration process and whether there is a difference with existent processes. Registration may be a lengthy process sometimes and any potential improvement out of standardisation and optimisation would be appreciated.
Sembcorp Energy UK	Yes	No comment provided
Siemens	Yes	A single point of central registration is a sensible and necessary position.

Respondent	Response	Rationale
Smart Metering Systems (SMS)	Yes	SMS supports the registration process outlined within the draft BSC procedure.
Stark	Yes	<p>Agree that the registration process as detailed in consultation provides a suitable process.</p> <p>AMSIDs will be registered with the SVAA and the VLP will be responsible for linking the AMSID to the Boundary Point MSID.</p> <p>This in alignment with current processes using DTN flows and common practise of pseudo MPANS.</p>
Tonik Energy Ltd	Yes	<p>We agree with the registration process for asset meters by the VLP, however there appears to be a discrepancy in the documents. The Assessment Procedure document states that the Asset Meter can be registered at the same time as we apply for the CoP11 approval of the device. BCP602 states that on registration of the asset meter, that it validates that the asset meter details are a CoP11 approved device.</p> <p>We recommend that validation is changed in Section 3.7 (validation stage 1) so that the asset meter is either an approved device or one waiting for approval under CoP11.</p> <p>Only when the MSID & ASMID pairs are assigned to an SBMU should the asset meter be confirmed that it is CoP11 approved. This is already specified in Section 3.1 (validation stage 1)</p>
Voltalis	Neutral	No comment provided

Question 8: Do you agree with the proposed roles for BSC Party Agents as described above?

Summary

Yes	No	Neutral/No Comment	Other
16	3	3	0

Responses

Respondent	Response	Rationale
Association for Decentralised Energy	Yes	No comment provided
Association of Independent Meter and Data Agents (AIMDA)	Yes	We support the proposed roles for BSC Party Agents outlined within the draft BSC procedure.
Association of Meter Operators	No	<p>It is not clear what the role is.</p> <p>There is no redlined versions of BSCP502 or 514 so not easy to judge.</p> <p>It is not clear what a MOA of Associated MOA is or how it differs from a MOA. The legal drafting makes no distinction.</p> <p>The BSC currently requires a single MOA to be appointed to a site. This approach should be continued in P375 to ensure the site is correctly metered and any changes at site are correctly considered in revising MTD, single line diagram, etc.</p>
Centrica	Neutral	There is insufficient detail in the documents to provide a considered response. The industry experts group therefore is important to determine the details on this. We would like to be involved and we suggest cross code representation.
DETA & EMA	Yes	Provided that these roles can be undertaken at a price point commensurate with revenues being generated by each asset.
Drax BSC Parties	Yes	Although not specified within the modification itself, we do agree with the Workgroup view that the company undertaking the role of MOA may only do so for asset metering and that they may only encounter CoP11 meters (and so may have limited/no experience/qualification for other Settlement meter types).

Respondent	Response	Rationale
		Similarly, existing BSC-qualified MOAs may not be familiar with the operation of many asset meters but, because they have completed the full BSC Qualification they should be permitted to be appointed as an asset meter MOA.
E.ON Energy Solutions Ltd	No	<p>Without qualification against meters (like CoP compliance & protocols approvals for boundary meters) how will industry have confidence that HHDC's are able to confirm that they are able to communicate with non-asset meters to obtain the required balancing data.</p> <p>We also note that the appointment of HHDC/MOA's by BSC parties is proposed to work in a similar way to the appointment of SBMU HHDCs (with the sending of Data flows as laid out in the relevant BSCPs), however the traditional dataflows used for boundary point appointments are also subject to the measures in the Performance Assurance Framework for settlement purposes. Therefore, we feel further consideration needs to be given to ensure that balancing activities do not also get unduly become reported in settlement assurance activities.</p>
EDF	Neutral	No comment provided
Enel X	Yes	We have no changes to suggest
Flexitricity	Yes	<p>The use of HHDCs to provide the route for asset metering data to enter settlement systems ensures that integrity of settlement systems remains as well protected as it is now. The cost of the HHDC route must nevertheless be monitored to ensure that asset metering remains an economic option for smaller sites, as the number of qualified HHDCs is limited.</p> <p>See Q9 for our views on asset MOAs.</p>
IMServ	No	It is unclear to us who is doing what activities in regard to data retrieval, validation and estimation for the different types of asset metering and what levels of qualification/accreditation will be needed for these activities.
NGESO	Yes	The suggested roles for BSC Party Agents looks suitable
RWE Supply & Trading GmbH	Yes	We agree with the proposed roles for BSC Party Agents. The role of BSC Party Agents in relation to asset meters should, as far as possible, replicate

Respondent	Response	Rationale
Salient Systems Limited	Yes	<p>the role of existing BSC Party Agents with respect to boundary meters.</p> <p>Again, as per response to Q7, we generally agree with the proposed agent roles as outlined but we expect that subsequent phases of P375 will further clarify and refine roles and may identify additional required data interfaces between parties.</p> <p>Of particular note, it is not clear from the discussion of agent roles at this Assessment whether constraints or particular scenarios will exist that will influence VLP flexibility to appoint alternate HHDC and MOA for an AMSID to those that are also appointed by the Supplier at the implicated MSID.</p> <p>The Business Requirements description of data required to be provided to SVAA from VLP to register AMSID suggests that the VLP is free to appoint their own preferred agent. However, the P375 solution must be capable of supporting potential multiple VLP interests at a metering system and established consumption differencing processes and rules would be applied to calculate each VLP AMSID delivery position. This proposition might suggest that default industry prescribed constraints where differencing rules are required will also apply here – i.e. that the same HHDC and MOA might be expected to be appointed at the MSID and across all AMSID’s implicated at the MSID.</p> <p>Where a single HHDC is appointed at an MSID and at all AMSID’s in play at the MSID then such HHDC will be well positioned to service effectively and efficiently all parties with an interest at the MSID. Nevertheless, VLP’s will typically have an interest at multiple MSID’s. Relationships will likely be in play in any case between a VLP and multiple HHDC agents across MSID’s in addition, perhaps, to multiple HHDC agents within MSID’s.</p> <p>Where multiple HHDC’s are involved at an MSID then there may be inefficiencies and additional costs attached to duplicated service infrastructures. Implications/impacts may perhaps also be expected upon additional required consumption data interfaces between HHDC’s and/or parties. For example, consumption at all asset meters and non-asset meters at the MS will be required to support any differencing calculations that may be implicated. Additionally, any further value that the HHDC may be able to provide to VLP may be compromised without an HHDC view of all consumption data at all</p>

Respondent	Response	Rationale
		<p>meters – to advise VLP, for example, where asset delivery may be in question when compared to total metering system variations or where delivery confirmation may be compromised by particular (hopefully published) assurance checks/constraints that may be exercised at SVAA.</p> <p>Flexibility afforded to the VLP when appointing MOA will likely also require further policy scrutiny. An MOA appointed to the MSID by the Supplier would be responsible for the metering system as a whole, including any 'asset' meter(s). Depending upon MC the Supplier MOA may also be responsible for proving the MS as a whole. Opportunity afforded to the VLP to appoint an alternate and additional MOA agent would seem perverse.</p> <p>The end customer of P375 services will be keen to assure efficiency, economy and consistency of service delivery from VLP's, Supplier and metering agents. The I&C customer will be well placed to directly choose or influence the choice of MOA and HHDC agents that will be appointed by VLP's. They will perhaps contract directly with particular agents already. It might be expected that pragmatic and consistent solutions to appointment of agents to I&C customers of services from VLP's will be favoured in practice. The constraints or flexibility afforded to future domestic customer candidates to influence agent appointments to deliver P375 services is less clear and will be an issue that should attract attention from Ofgem.</p> <p>Whatever the final outcomes of any policy decisions upon VLP agent appointment flexibility it is anticipated that significant further refinement of Business and Data requirements and interfaces will be implicated at later phase of P375 progression, alongside CSD extensions/refinements (Q23).</p>
Scottish Power	Yes	No comment provided
Sembcorp Energy UK	Yes	No comment provided
Siemens	Yes, with caveat	<p>Keeping the registration of agents process consistent is, we believe, the correct approach but there is a current lack of detail in the responsibilities of the HHDC, particularly given that there is currently no tracked changes version of BSCP502. For example, what are the DC's estimation responsibilities? Are these to mirror Supplier</p>

Respondent	Response	Rationale
		<p>Serviced MPANs? What format will the data be sent to the SVAA?</p> <p>Without these references it is difficult to make a judgement on the full impact on the DC.</p>
Smart Metering Systems (SMS)	Yes	SMS supports the proposed roles for BSC Party Agents outlined within the draft BSC procedure.
Stark	Yes	By using qualified agents provides alignment with current processes.
Tonik Energy Ltd	Yes	<p>We agree that it should be the VLP responsibility to register the AMSID pairs including the metering details to ensure the role of MOA Alternative can be kept as lightweight as possible</p> <p>Ensure that there are minimum barriers for new entrants as MOA Alternatives</p>
Voltalis	Neutral	No comment provided

Question 9: Do you agree with the proposed Qualification route for asset meter MOAs?

Summary

Yes	No	Neutral/No Comment	Other
16	2	4	0

Responses

Respondent	Response	Rationale
Association for Decentralised Energy	Yes	The approach described in the consultation is a sensible and proportionate one.
Association of Independent Meter and Data Agents (AIMDA)	Yes	We support the proposed qualification route for asset meter operating agents outlined within the draft BSC procedure.
Association of Meter Operators	No	<p>It is not clear what the proposed Qualification route is. In parts of the consultation document and legal text it refers to a MOA, yet the consultation document makes reference to an "Alternative MOA". It is not clear what this role is.</p> <p>In the consultation document is also refers to using an MOA for larger sites and an Alternative MOA for smaller. The distinction appearing to be CoP3. The risks of erroneous settlement data are generally associated with CT metering, so a sensible separation may be between CT & whole current metering.</p> <p>The AMO have raised a BSC Issue proposing to realign the BSC Metering CoP thresholds to more pragmatic engineering thresholds such as replacing the 100kW threshold to be CT/whole current, and the CoP5/CoP3 threshold to be LV vs. HV.</p>
Centrica	Neutral	There is insufficient detail in the documents to provide a considered response. The industry experts group therefore is important to determine the details on this. We would like to be involved and we suggest cross code representation.
DETA & EMA	Neutral	No response provided
Drax BSC Parties	Yes	We agree that Meter Operators who will only provide services for asset meters need only complete the BSC Qualification process applicable to asset meters but should they subsequently wish to be a MOA for non-asset meters they will need to

Respondent	Response	Rationale
		complete those parts of the full BSC Qualification not completed as part of their BSC asset meter MOA Qualification. This is because asset meter MOAs may only encounter CoP11 Meters, whereas full BSC qualified MOAs will encounter a wide range of Settlement meter types.
E.ON Energy Solutions Ltd	Yes	No comment provided
EDF	Neutral	No comment provided
Enel X	Yes	We have no changes to suggest
Flexitricity	Yes	<p>The proposal to permit a MOA to specialise in the more limited role of asset meter operator agent, rather than insisting that only MOAs with full boundary meter capability should perform this function, should help to keep asset metering economic for smaller sites. The openness of this route increases competition.</p> <p>There is no reason why existing MOAs should not offer this service, and some VLPs might choose integrated HHDC/MOA providers for simplicity.</p>
IMServ Europe	Yes	No comments provided
NGESO	Yes	The suggested qualification route for asset meter MOAs seems appropriate
RWE Supply & Trading GmbH	Yes	We agree with the proposed Qualification route for asset meter MOAs.
Salient Systems Limited	No	Preference would be that default MOA qualification is extended if necessary and all appointments were directed to qualified MOA. An option would be for MOA to effectively authorise particular 3rd party specialist 'meter worker' organisation to carry out particular asset related specialist works where/if required and under the auspices of the MOA qualification – where the 3rd party has successfully and formally satisfied appropriate MOA audit of meter worker competencies, safety and service delivery processes and procedures (similar to existing regimes whereby MOAs use 3rd party meter workers)
Scottish Power	Yes	No comment provided
Sembcorp Energy UK	Yes	No comment provided

Respondent	Response	Rationale
Siemens	Yes	Although the consultation document appears to initially suggest existing BSC Qualified MOAs would not be qualified to maintain COP11 Meters, it is later clarified that they will be automatically qualified to be appointed to an asset meter. If this is the correct reading then we support this proposal.
Smart Metering Systems (SMS)	Yes	SMS supports the proposed qualification route for asset meter operating agents outlined within the draft BSC procedure.
Stark	Yes	Allows for competition by lowering obligations for asset only MoP; requiring currently qualified MoPs to requalify for asset metering ensures MOP able to provide adequate support.
Tonik Energy Ltd	Yes	As the MOA Alternative is a lightweight role that would be applicable to non-existing BSC parties. The process for becoming a MOA Alternative should not be a unwieldy process and should be documented in a simple way to make it easy to understand. To ensure that the qualification process is not a barrier to entry as a MOA Alternative
Voltalis	Neutral	No comment provided

Question 10: Do you agree with the process for sharing Metered data as described above?

Summary

Yes	No	Neutral/No Comment	Other
16	1	5	0

Responses

Respondent	Response	Rationale
Association for Decentralised Energy	Yes	No comment provided
Association of Independent Meter and Data Agents (AIMDA)	Yes	We support the overall shared metered data procedure.
Association of Meter Operators	Neutral	No comment provided
Centrica	Yes	No comment provided
DETA & EMA	Neutral	No comment provided
Drax BSC Parties	Yes	We agree with the process for sharing of asset meter data between the VLP, HHDC and SVAA, as well as Boundary Point Meter data from the HHDA as it has been designed to emulate existing arrangements as much as possible.
E.ON Energy Solutions Ltd	Yes	We feel there needs to be a mechanism to inform the Supplier at the boundary point if an asset is impacting the Balancing position of the primary Supplier, as we believe that this is a particularly gap that has created unnecessary burdens as part of P344's processes.
EDF	Neutral	No comment provided
Enel X	Yes	We have no changes to suggest
Flexitricity	Yes	The proposal is consistent with existing arrangements, including the delivery of AMSID data from the VLP to SVAA without passing through an HHDA. This latter point is essential to the functioning of P375 (and indeed P344) as the SVAA requires unaggregated data in order to correctly ascribe VLP volumes to the correct BMUs containing the corresponding MPAN pairs.

Respondent	Response	Rationale
IMServ Europe	No	<p>Again, it is unclear who is doing what, please explain.</p> <p>Does the HHDC have to resubmit data in line with the Settlement calendar or is it just as soon as data / updated data becomes available.</p> <p>P375-BR28 talks about the data being submitted and that it will contain an Actual/Estimated flag and yet there is no mention of an estimation Business Requirement. We assume this element still needs to be defined? We would look forward to exploring this area further with Elexon via the suggested CSD expert group.</p> <p>We are also unsure whether it is intended that VLPs have the opportunity to collect data from Asset meters or not – they are included in BSCP601 but are not included in the BR as someone who might retrieve the data (BR375-11 “VLP must appoint HHDC” and BR375-28 “HHDC must send Metered Volume data to SVAA”) Please clarify.</p> <p>Chasing HHDCs for data at D+3 needs to be explored further.</p> <p>Does SVAA have enough information in order to determine CCC?</p>
NGESO	Yes	Yes, this process seems suitable
RWE Supply & Trading GmbH	Yes	We agree with the process for sharing Metered data as described.
Salient Systems Limited	Yes	Yes, as far as high-level descriptions go at the moment. Expectation, however, is that business requirements, data requirements and data interface requirements between parties will be refined at subsequent phases of P375 progression.
Scottish Power	Yes	No comment provided
Sembcorp Energy UK	Yes	No comment provided
Siemens	Yes	Although the registration and consumption processes for HHDC remain fairly similar to those used for SMETS Meters it is difficult to see how this would work for HHDCs given the “one removed” element of an asset Meter from the boundary point. Although the type of activity that the SVAA will be carrying out would typically sit with an HHDC we recognise the difficulties this could pose if vested within the HHDC.

Respondent	Response	Rationale
		However, HHDA's do follow a rigorous Qualification process and are subjected to an annual audit and it is suggested that a similar activity is imposed upon the SVAA to assure industry that similar rigour is applied when netting sub-metered from boundary point metered data.
Smart Metering Systems (SMS)	Yes	SMS supports the overall shared metered data procedure.
Stark	Yes	As detailed in consultation & workgroup discussions, the process for sharing of asset meter data between the VLP, HHDC and SVAA, as well as Boundary Point Meter data from the HHDA has been designed to emulate existing arrangements as much as possible.
Tonik Energy Ltd	Neutral	No comment provided
Voltalis	Neutral	No comment provided

Question 11: Do you agree with the Workgroup that the draft legal text in Attachment A delivers the intention of P375?

Summary

Yes	No	Neutral/No Comment	Other
15	1	6	0

Responses

Respondent	Response	Rationale
Association for Decentralised Energy	Yes	The draft legal text appears to deliver the intention of P375.
Association of Independent Meter and Data Agents (AIMDA)	Yes	We agree that the draft legal text would deliver the intention of P375.
Association of Meter Operators	No	<p>L1.1.2 seems to remove the need for reactive data, yet the consultation document indicates this should be measured.</p> <p>L1.2.1 et al It is not clear why the requirements of SL100 have been removed, these provide essential auditor trails and are applicable to all stakeholders.</p> <p>L2.5.1 The SVA & CVA para seems to have moved incorrectly</p> <p>S2.3.3 It is not clear who is responsible for the accuracy of the consumption data the VLP or the HHDC</p> <p>S2.3.3B Need to ensure there is an obligation for de-appointment of agents</p> <p>S 10.3.2 Deeming compliance has a risk. It is not clear what changes to HHDC are required as there is no redlined BSCP502. The decision on deeming should be taken by PAB once the level of change is determined. Similar for MOA</p> <p>Definition of HHDA – the HHDA only operates in SVA market, so not sure why the proposed definition refers to CVA</p> <p>Definition of kWh – the level of granularity of the kWh data is not stated. This should be explicitly stated as to 0.000kWh as per smart metering data</p>
Centrica	Neutral	We have not been able to review the legal text.

Respondent	Response	Rationale
DETA & EMA	Neutral	No comment provided
Drax BSC Parties	Yes	We have no additional comments at this time
E.ON Energy Solutions Ltd	Yes	No comment provided
EDF	Neutral	No comment provided
Enel X	Yes	It looks like it should work.
Flexitricity	Yes	No comment provided
IMServ Europe	Yes	Section 2.3.2.A I think the word Secondary is missing from "...before the Asset Metering System is allocated to a BM Unit."
NGESO	Yes	We have no major concerns on the legal as it is currently drafted and have fed minor comments back via the workgroup.
RWE Supply & Trading GmbH	Yes	We agree with the proposed legal text. The proposal introduces significant new arrangements into the BSC and extensive changes to the legal text are required. The proposal replicates existing processes for asset meters to the extent possible. On the basis of our limited review of the legal text we expect that it will deliver the intention of P375.
Salient Systems Limited	Neutral	No comment provided
Scottish Power	Yes	No comment provided
Sembcorp Energy UK	Yes	No comment provided
Siemens	Yes	No comment provided
Smart Metering Systems (SMS)	Yes	We agree that the draft legal text would deliver the intention of P375.
Stark	Yes	Main legal text changes are fairly complex mainly due to new SVAA requirements; the text as drafted however does appear to covered the required intentions of P375.
Tonik Energy Ltd	Neutral	No comment provided
Voltalis	Neutral	No comment provided

Question 12: Do you agree with the Workgroup that there are no potential Alternative Modifications within the scope of P375 which would better facilitate the Applicable BSC Objectives?

Summary

Yes	No	Neutral/No Comment	Other
15	3	4	0

Responses

Respondent	Response	Rationale
Association for Decentralised Energy	Yes	The Workgroup, which the ADE participated in, thoroughly discussed P375 and different possible approaches, coming to the unanimous conclusion that no Alternative Modification would better facilitate the Applicable BSC Objectives.
Association of Independent Meter and Data Agents (AIMDA)	Yes	We agree with the working group that further modifications are not necessary to deliver P375.
Association of Meter Operators	No	Still believe the use of BSP550 meter sharing would be a viable alternative. The changes being implemented as MHHS will make supporting a framework considered by P375 far easier to implement.
Centrica	Yes	No comment provided
DETA & EMA	Neutral	No comment provided
Drax BSC Parties	Yes	We have no additional comments at this time.
E.ON Energy Solutions Ltd	Yes	There does need to be a strong consideration of the additional benefits from P379 and the associated costs, noting that modification is currently undergoing a cost/benefits exercise.
EDF	Neutral	No comment provided
Enel X	Yes	We cannot think of any improvements.
Flexitricity	Yes	The central issue addressed by P375 is the lack of discrimination of balancing services provided by assets below the boundary meter, and the related lack of verifiability of volumes reported under P344. The solution is to allow metering at source, as an adjunct to existing BSC boundary meter processes. This is a direct solution to the problem. No

Respondent	Response	Rationale
		alternatives were proposed within the P375 workgroup.
IMServ Europe	No	It is not clear why the existing interfaces between SVAA and HHDA are not being used to facilitate the transfer of metering data to central settlement. This would simplify matters for HHDCs, and bring consistency to these arrangements with other secondary settlement arrangements such as P344. It is also unclear why there is a separate SVA registration system as opposed to reusing the industry's core registrations systems for these activities. This would surely be a more robust solution with less duplication for all parties, as it would re-use existing processes and data exchange interfaces as well as creating a single source of all registration data for other processes to use.
NGESO	Yes	We don't believe there are other alternatives that could resolve the identified defect within the scope of the modification. We do believe there may be merit in expanding the scope of the P375 solution to other BSC parties (e.g. Supplier's Additional BMUs) however we note that this is beyond the scope of P375 which is limited to Virtual Lead Parties and the additional complexity this would add.
RWE Supply & Trading GmbH	Yes	We have not identified any potential Alternative Modifications within the scope of P375 which would better facilitate the Applicable BSC Objectives
Salient Systems Limited	No	Would favour P375 and P376 being progressed together as consolidated mod. Feel that P376 has significant merit and will underpin some of the assurance of P375 that will be applied by SVAA.
Scottish Power	Yes	No comment provided
Sembcorp Energy UK	Yes	We agree with the WG that the solution proposed by P375 is suitable to address the identified defect and it better facilitates the Applicable BSC Objectives. Therefore, there are no other more suitable alternatives.
Siemens	Yes	Not directly in the scope of P375 but we believe P375 would better facilitate Applicable BSC Objective (c) if combined or implemented with P379.
Smart Metering Systems (SMS)	Yes	SMS agrees with the working group that further modifications are not necessary to deliver P375.

Respondent	Response	Rationale
Stark	Yes	Workgroup discussions were unanimous that alternative options would not result in a different consensus to proposed P375 solution.
Tonik Energy Ltd	Neutral	No comment provided
Voltalis	Neutral	No comment provided

Question 13: Will P375 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
16	1	5	0

Responses

Respondent	Response	Rationale
Association for Decentralised Energy	Yes	As a trade association, the ADE will not be directly impacted by P375. A large number of ADE members, however, have indicated that P375 will have an extremely positive impact on their organisation, greatly facilitating participation in the Balancing Mechanism.
Association of Independent Meter and Data Agents (AIMDA)	Neutral	AIMDA members will individually respond to this question
Association of Meter Operators	Neutral	Not relevant as a trade association
Centrica	Yes	Following the implementation of P344, we do not foresee any additional costs for Balancing Service Providers if the same flows are used. There is still some detail to be worked through and therefore at this time it is unclear whether there will be costs for implementation. If amendment to flows and/or new flows are required
DETA & EMA	Neutral	No comment provided
Drax BSC Parties	Yes	After an initial review of the Business Requirements Document, P375 is a material change and one that is expected to have system and process impacts. Unfortunately, at this time, we are unable to quantify the full magnitude of these impacts. More clarity is required as to the interactions between the asset controlled by the third party aggregator and the rest of the site. For example, assume a scenario with two heaters in a single property. The potential reduction of consumption of one of the heaters by an aggregator for the provision of balancing services under P375 could result in an increase in consumption of the other heater with unforeseen consequences for the energy supply of the remainder of the site and this could expose the Supplier to unpredictable costs.

Respondent	Response	Rationale
E.ON Energy Solutions Ltd	Yes	The impacts of parties participating in the VLP market would clearly impact any lead supplier's volume and ability to accurately forecast volumes at the boundary point, especially if the VLP are changing the way that assets have been traditionally used at site and thus changing the consumer profile.
EDF	Yes	<p>We support P375 and its attempt to introduce more settlement data for assets located behind the boundary meter. However, P375 appears to deliver only part of the solution, ie to improve the situation for balancing services providers but seems to do nothing to improve the situation for imbalance related activities.</p> <p>We agree that the modification has the potential to unlock many other opportunities to help achieve decarbonisation targets as it could help facilitate EV charging infrastructure and Heat Network Investment projects. However, we are disappointed that P375 does not alleviate the concerns EDF raised in our response to the Customer Consent solution in P344/P354. This solution allows a third party to participate in balancing services using accurate settlement data whilst still not allowing for the primary supplier's imbalance position to be adjusted accordingly.</p>
Enel X	Yes	It will allow us, as a Virtual Lead Party, to enrol assets for BM and TERRE participation where it otherwise would not have been possible. This is an entirely positive impact.
Flexitricity	Yes	Flexitricity is a Supplier and as such may be the recipient of volumes flowing from VLPs. It is in our interest to ensure that such flows are derived from verifiable measurements. P375 will provide confidence that we as a Supplier will not be affected by inaccurate volumes applied to our consumption account.
IMServ	Yes	<p>Full impact can only be confirmed once all the CSDs are completed and all the details are known but we speculate the following major impacts:</p> <p>Our HHDC systems would have to be aligned to support P375 in such areas as:</p> <ul style="list-style-type: none"> • The systems we use to retrieve data • The registration process

Respondent	Response	Rationale
		<ul style="list-style-type: none"> Validation requirements would need to be understood and potentially updated Estimation requirements would need to be understood and potentially updated Fault reporting PARMs The reporting process to VLPs would need to be developed <p>Training and recruitment</p> <ul style="list-style-type: none"> We may need to consider the impact on human resources <p>Documentation</p> <ul style="list-style-type: none"> It is likely that Operational Procedures and LWI would need to be written
NGESO	Yes	<p>We do not expect P375 to have a direct impact upon the NGESO but expect there will be some consequential impacts. Some of our systems and business processes need information on MSIDs, these will need to be updated to also accept AMSIDs and potentially map MSIDs to AMSIDs.</p> <p>Once P375 is implemented, we expect to see a growing number of Asset Meters to be used to provide a wide range of Balancing Services through all available routes individually and as part of wider aggregated units.</p>
RWE Supply & Trading GmbH	No	No comment provided
Salient Systems Limited	Yes	<p>We will extend our HHDC/DA and HHMO/NHHMO systems to accommodate final agreed requirements/CSD's etc.</p> <p>In addition to building BSC prescribed extensions to our industry systems to accommodate P375 we are also investing in complementary supporting data management systems that will integrate with our HHDC/DA solutions and will manage the commercial contracts/commitments/relationships between parties at P375 and further flexibility products.</p>
Scottish Power	Yes	From the renewables, this seems to facilitate registration and settlements of Secondary BMUs for Windfarm-battery storage co-located sites.

Respondent	Response	Rationale
Sembcorp Energy UK	Confidential	Confidential
Siemens	Yes	<p>HHDCs will be affected though to what extent is determined by responses to Q8 where we request more detail on the HHDC's responsibilities and a tracked changes version of the BSCP.</p> <p>There will also be an anticipated impact on the Meter Operator role with an expected increase in activity and a need to ensure training and processes are in place to manage COP11 Metering.</p> <p>There is not expected to be any impact on the HHDA.</p>
Smart Metering Systems (SMS)	Yes	<p>P375 will have significant impact upon SMS; including both some immediate costs, and we hope provide opportunities to offer a more innovative and tailored services to householders, with the support of energy supply companies.</p> <p>During the implementation period, SMS will invest in upgrading its systems, documentation and processes for BSC agents and VLPs to adapt to P375. As the largest independent supplier of smart meters in the UK, we will also invest in additional R&D to develop enhanced metering devices able to deliver the parent and sub-metering model.</p> <p>Following the launch of P375, we anticipate that the proposed change should boost the market for smart metering technology and B2B services, including supporting innovative heat and EV charging as a service models, and the ability to offer network load control services in line with BEIS objectives.</p>
Stark	Yes	<p>Offering HHDC services for asset meters will require new processes to be implemented;</p> <p>The details of these will involve CSD changes to accommodate processing of AMID appointments, which have yet to be agreed, but discussions have suggested will follow current process timelines. This will require some operational system changes with associated testing.</p> <p>When asset register is available, any new COP11 meter asset testing will also be required to compatibility of systems to enable data collection.</p>
Tonik Energy Ltd	Neutral	No comment provided

Respondent	Response	Rationale
Voltalis	Neutral	No comment provided

Question 14: Will you be likely to participate in P375 following implementation?

Summary

Yes	No	Neutral/No Comment	Other
14	1	6	1

Responses

Respondent	Response	Rationale
Association for Decentralised Energy	Yes	Many ADE members have indicated interest in using the P375 solution to participate in the BM. The solution and associated COP11 metering standards are likely to be useful in facilitating wider industry changes too.
Association of Independent Meter and Data Agents (AIMDA)	Neutral	AIMDA members will individually respond to this question
Association of Meter Operators	Neutral	Not relevant as a trade association
Centrica	Yes	We would participate in P375 following implementation. For example, we are aware of behind-the-meter technologies and customers at domestic and non-domestic level that would like to participate in the Balancing Mechanism but cannot currently as the on-site demand cannot be managed in a way to provide an accurate Physical Notification.
DETA & EMA	Neutral	No comment provided
Drax BSC Parties	Yes	Yes, potentially. P375 should enable more efficient participation of Demand Side Response and support to propositions such as Behind-the-Meter Storage, Electric Vehicles, etc., including clearer allocation of responsibilities between suppliers and third party aggregators.
E.ON Energy Solutions Ltd	Yes	This will be determined once we have assessed the requirements of our customers although we do have a desire to participate.
EDF	Neutral	P375 or more specifically the introduction of additional settlement metering has the potential to bring future wider benefits and opportunities. We support BSC developments which can allow easier

Respondent	Response	Rationale
		deployment of initiatives that helps achieve decarbonisation targets.
Enel X	Yes	Yes. It's a useful and necessary reform, and we anticipate using it on multiple customer sites, either by itself or in conjunction with P376.
Flexitricity	Yes	<p>Flexitricity is a Virtual Lead Party and an active user of the P344 provisions. We have continuously delivered ancillary services to the GB System Operator since 2008, using operational metering located on assets. It is this operational metering which formed the template for the P375 asset metering concept, and it is P344 which made it essential for asset metering to become a formal process under the BSC.</p> <p>We expect that asset metering will be used on all capacity which we present through the VLP route. This will extend from behind-the-meter batteries (active in BM Wider Access now) through commercial buildings and a variety of industrial sectors, ultimately to household flexibility including EVs, heating and home batteries. Flexitricity currently manages a portfolio in excess of 500MW, and we hope to present similar volumes to the BM through P375 asset metering.</p>
IMServ Europe	Yes	As a HHDC and HHMOA we would be interested in providing this service to VLPs
NGESO	No	Whilst we will not be participating in P375 directly as a participant, we will be involved in the broader evolution of the solution.
RWE Supply & Trading GmbH	Neutral	This modification will open up the market and provide opportunities both for new entrants and existing market participants. In this context P375 will enable parties to provide aggregated balancing services through secondary BMUs associated with, for example, electric vehicles and small scale storage.
Salient Systems Limited	Yes	<p>We will encourage and support our metering agent and Supplier clients who use our industry solutions to deliver the benefits of P375 to their customers and to the BM.</p> <p>P375 supporting solution components will be integrated within each standard configuration of our automated HHDC/DA, MOA industry system solutions operating at clients.</p>

Respondent	Response	Rationale
Scottish Power	Yes	No comment provided
Sembcorp Energy UK	Confidential	Confidential
Siemens	Yes	Although P375 is an important implementation we believe its benefits cannot be fully realised by consumers until the implementation of P379 that will allow the appointment of multiple suppliers to assets behind the boundary metering point. We believe that P375 and P379 should be either implemented together or joined together as single proposal.
Smart Metering Systems (SMS)	Yes	As noted in response to question 13, SMS will participate fully in P375 as we anticipate that it will help us provide innovative ways of cooperating with like-minded energy supply company partners, to provide the householder with greater choice, while supporting the uptake of innovative heat, EVs, and other exciting low carbon technologies.
Stark	Yes	As a qualified HHDC will elect to participate as a VLP agent for the P375 process.
Tonik Energy Ltd	Yes	<p>Tonik Energy is currently involved with a DSR trial using asset metering on domestic charge points for monitoring the delivery of the service. We would like to commercialise this process and the P375 would enable us to do that.</p> <p>Our sister company, The Phoenix Works is involved in the deployment of BTM assets – including charge points, solar PV and batteries and would look to qualify as a MOA Alternative to enable them to use the assets that they are installing to be compatible with DSR services in the future.</p>
Voltalis	Neutral	No comment provided

Question 15: Will your organisation incur any costs in implementing P375?

Summary

Yes	No	Neutral/No Comment	Other
12	3	5	2

Responses

Respondent	Response	Rationale
Association for Decentralised Energy	No	As a trade association, the ADE will not incur any costs. As stated during the Workgroup, however, any costs associated with P375 are likely to be recovered via increased asset participation in flexibility markets. If a VLP does not believe that this will be possible, they will not follow the P375 route. Feedback from ADE members indicates that uptake of the P375 solution is likely to be significant.
Association of Independent Meter and Data Agents (AIMDA)	Neutral	AIMDA members will individually respond to this question
Association of Meter Operators	Neutral	Not relevant as a trade association
Centrica	Yes	The £2m costs that are referenced in the document appear to be high. There is limited evidence as to why this cost is so high and there is limited backing data on benefits. As a Supplier, we would be liable for a proportion of the £2m costs passed through; therefore, we think there needs to be a better analysis of the costs and benefits.
DETA & EMA	Neutral	No comment provided
Drax BSC Parties	Yes	In line with our response to Q13, after an initial review of the Business Requirements Document, P375 is a material change and one that will have system and process impacts and associated development costs. Unfortunately, at this time, we are unable to quantify the full magnitude of these impacts.
E.ON Energy Solutions Ltd	Yes	Should we decide to participate then as a Supplier and/or as Virtual Lead Party we would need system development.

Respondent	Response	Rationale
		As an agent both MOA and HHDC will require system upgrades to allow the servicing of any consumers if appointed, at this point we believe costs would be significant due to the need to split out agent services offered for both traditional and balancing services markets.
EDF	Minimal	The P375 solution itself should have a minimal impact for EDF so long as delivery is within the normal BSC Systems Release.
Enel X	Yes	We will incur costs, but only to the extent that we choose to enrol customer sites that would not otherwise be able to participate. Hence the costs to us will always be outweighed by the benefits to us – otherwise we would not choose to do it. It makes no difference to us whether P375 is implemented as part of a normal BSC Systems Release.
Flexitricity	Yes	<p>We will incur one-off costs in adapting our software to make use of the P375 route, and ongoing costs with HHDCs and asset MOAs supporting sites. We will also incur per-site costs in installing asset meters at our customers' sites (in the case of embedded meters these will be incorporated in device costs which typically fall to customers). We do not believe that implementation within or outside of a normal BSC Systems Release will have a significant effect on these costs.</p> <p>Many of these costs would be considered to be the normal cost of doing business in flexibility and aggregation markets. We already incur operational metering installation costs as these are required for operational purposes; P375 simply formalises the accuracy requirements which we already impose. We defer to others for Type 5 asset meter costs relative to business-as-usual. However, we have fed back through the workgroup views we have gathered from manufacturers of such devices, and it is our view that CoP11 as written does not impose an excessive hardware cost.</p> <p>Beyond these general comments, we prefer not to give details of or speculate on the likely costs.</p>
IMServ Europe	Yes	<p>Development costs are likely to be in the region of £190k to £280k</p> <p>Ongoing costs are likely to be similar to those of a SVA metering system since, at a high level, the activities being performed are similar.</p>

Respondent	Response	Rationale
		<p>Protocol approval costs are also likely to be similar to the existing approval costs.</p> <p>These costs are unlikely to be affected if this was implemented outside of a normal release.</p>
NGESO	No	Not directly but please see our response to Q13.
RWE Supply & Trading GmbH	No	We do not expect to incur any direct costs as a result of implementing P375.
Salient Systems Limited	Yes	<p>System extension once-off costs, ongoing low maintenance and support costs.</p> <p>Preference would be that implementation aligned with normal BSC system release.</p>
Scottish Power	Yes	Costing are still to be determined, although there is no indication that those will be significant. We agree with the principle that costs associated with P375 are recoverable through increased asset participation in flexibility markets and are considered as part of the financial decision to participate in the implementation.
Sembcorp Energy UK	Confidential	Confidential
Siemens	Yes	Although without fully understanding the detail of the HHDC changes there will be costs incurred in setting up routes to the SVAA, though these are not expected to be excessive. If estimation processes are amended to accommodate BTM meters then these costs would increase fairly significantly.
Smart Metering Systems (SMS)	Yes	As noted in response to question 13, SMS anticipates some costs arising the implementation of P375, including one-off system costs and management costs, as well as R&D investment.
Stark	Yes	Development costs related to any system changes to facilitate will only be determined when changes to CSD finalised & when extent of COP11 assets are known.
Tonik Energy Ltd	Neutral	No comment provided
Voltalis	Neutral	No comment provided

Question 16: Do you agree with the potential future benefits of implementing P375 as described above?

Summary

Yes	No	Neutral/No Comment	Other
20	1	1	0

Responses

Respondent	Response	Rationale
Association for Decentralised Energy	Yes	<p>The ADE strongly agrees with the potential future benefits of implementing P375, as described in the consultation. Asset metering, as well as enabling VLPs to participate more effectively in the Balancing Mechanism, is likely to facilitate participation in the Wholesale Market and DSO balancing markets.</p> <p>It is also likely to play a significant role in the uptake of smart grids, with large volumes of integrated renewable generation and storage, and decarbonisation of heat via dynamic use of electric heating in response to system conditions. P375 will also lay the foundations for future changes to bring about new zero, including increased uptake of community energy, domestic DSR and smart EV charging, as well as enabling far more granular data availability.</p> <p>By enabling innovative companies to enter new markets and facilitating the development of new approaches to energy flexibility, P375 acts as an important enabler for delivering net zero.</p> <p>The ADE would note that the significant estimated benefits of P375 (£50m/year) vastly outweigh the estimated cost of implementation (£2m).</p>
Association of Independent Meter and Data Agents (AIMDA)	Yes	<p>AIMDA anticipates several primary benefits to implementing P375:</p> <ol style="list-style-type: none"> 1. Enhanced network balancing – By providing more accurate and granular metering data beyond the boundary, P375 will provide greater visibility and certainty to network operators. This will enable enhanced network balancing, maximising the capacity of existing infrastructure and accelerating connection of low carbon technologies; 2. Accelerated decarbonisation of the UK economy – By implementing individual asset metering, P375 will encourage the development of new commercial

Respondent	Response	Rationale
		<p>models like heating and EV charging as a service, increasing the affordability and uptake of these low carbon technologies;</p> <p>3. Reduced household energy bills – By increasing network visibility, P375 will enable more low carbon technologies to be connected to the UK energy network without the need for costly infrastructure reinforcement. This will deliver a win-win of more rapid decarbonisation while keeping customer energy bills low;</p> <p>4. Encouraging UK economic growth – By encouraging the uptake of new technologies and metering systems, P375 will foster the UK’s internal market for installation and construction of low carbon technologies. This timely intervention will dovetail with the UK’s coronavirus “Green Recovery” and Government’s “Build Back Better” objectives.</p>
Association of Meter Operators	No	P344 Project Terre has not been implemented and the timeframe keeps being delayed.
Centrica	Yes	We agree that this change will enable greater participation of customer assets in flexibility services.
DETA & EMA	Yes	<p>We agree with the workgroup that a major benefit of this change is providing an expanded toolset to distribution network operators (DNOs) as they transition to a Distribution System Operator (DSO) role. We expect the change to unlock new sources of flexibility and visibility of probable network conditions as outlined in the consultation document. It may be useful to engage DNOs if they have not responded widely to the consultation to review the changes specifically with DSO use cases in mind and gather their input to ensure that maximum benefit is achieved.</p> <p>In relation to EV charging, we have discussed P375 with consortium partners representing local authorities and a charge point power provider in a mass on-street charging roll out project. They are generally supportive of the changes proposed because of the potential to improve charge point economics through unlocking potential ongoing revenue streams with the caveat that any additional metering costs should be commensurate to potential benefits at an individual charger.</p>

Respondent	Response	Rationale
		We also note that delay in implementation of P375 delays access to these benefits and so would urge that the proposed timeline is maintained.
Drax BSC Parties	Yes	<p>We are supportive of P375 which should enable settlement of Secondary Balancing Mechanism (BM) Units using metering equipment 'behind the Meter'. This should allow more accurate reflection of the balancing-energy volumes provided by the Balancing Service Provider and at the same time help mitigate potential negative consequences for the Supplier.</p> <p>P375 should enable more efficient participation of Demand Side Response and support to propositions such as Behind-the-Meter Storage, Electric Vehicles, heat pumps, etc., including clearer allocation of responsibilities between suppliers and third party aggregators. By supporting the development of new propositions such as these, which enable greater demand side flexibility, P375 should help to contribute towards achieving net-zero decarbonisation ambitions.</p> <p>Suppliers will also benefit through more accurate Final Physical Notification (FPN) and delivered volumes.</p> <p>P375 will have a positive impact on Applicable BSC Objective (b) as it facilitates the participation of third party Aggregators and customers to the provision of Balancing Services which increases the options available to National Grid ESO when balancing the System. There is also a positive impact on Objective (c) because the change encourages more participation in the market, which increases competition. There is also a positive impact on Objective (e). P375 will facilitate participation in balancing products, including TERRE and the BM.</p>
E.ON Energy Solutions Ltd	Yes	It is worth noting that the uptake of P375 will be dependant on the uptake by the end consumers as without their interest the model will not work. This change should offer some flexibility although I don't feel it simplifies the process significantly.
EDF	Yes	In continuation of our answer to question 14 – it is difficult to evaluate the exact benefits. Intuitively, more settlement quality data should have a positive impact. The degree to which the future benefits can be realised it dependent on the commercial

Respondent	Response	Rationale
		terms surrounding the use of additional settlement data.
Enel X	Yes	In particular, we agree that the indirect benefits which P375 enables or facilitates are likely to be huge.
Flexitricity	Yes	<p>We appreciate the difficulty of estimating (and indeed the efforts made to estimate) the scale and range of benefit which would be enabled by the implementation of P375. We accept that the result is indicative, and that a different set of assumptions would produce a different net benefit.</p> <p>Without a final position on the operating model of flexibility in managing distribution networks and the way in which metering is used to support this, the role of P375 in reducing the need for distribution infrastructure capex (especially the “last mile” in residential streets) is conjectural. It is, nevertheless, a potentially very large number.</p> <p>Regardless of the above, we cannot conceive of a realistic set of assumptions which would result in the net present value of P375 being negative. Such assumptions would have to be based on the abandonment of the net zero carbon legislative target, the retention of liquid-fuelled transport and natural gas heating (both separately the subject of legislative “sunsets”), and a return to centralised generation as the dominant power source. Alternatively, large volumes of flexibility from distributed resources would have to be remunerated against “honesty box” metering. Neither outcome seems tenable.</p> <p>In short, if energy is indeed to be decentralised, democratised and digitised, then P375 will inevitably be required sooner or later. As both the BM Wider Access market and the energy smart appliance market are at an early stage, it is prudent to proceed now so that these markets develop within a clear framework.</p>
IMServ Europe	Yes	No comments provided
NGESO	Yes	We believe the main benefit of P375 is around the new avenue to market for assets located behind the boundary meter to be able to better access balancing and wholesale markets than they can today.

Respondent	Response	Rationale
RWE Supply & Trading GmbH	Yes	We agree with the potential future benefits associated with implementing p375. The modification will facilitate innovative new business models for both existing players and new entrants. It will expand the role of virtual lead parties in providing balancing services.
Salient Systems Limited	Yes	No comment provided
Scottish Power	Yes	We agree with the principle that if almost any type of energy flow measurement device could become an asset meter as they meet the minimum requirements. This will certainly provide significant benefits in favour of the future energy systems in regards to data exchange, asset visualisation and operation and commercial opportunities.
Sembcorp Energy UK	Yes	<p>We recognise the potential future benefits. By enabling VLPs to participate in the BM more effectively, this modification proposal will open the opportunity to a wider pool of providers, who feel that the asset meter arrangements are suitable.</p> <p>We also believe that maintaining the arrangements as voluntary is necessary as these are not suitable for all. Therefore, providers need to be allowed the choice as to whether they want to participate in P375 or not.</p>
Siemens	Yes	<p>Siemens believe P375 is necessary to continue the progress made in delivering a system that encourages competitive behaviour amongst participants and, in doing so, should provide competitive pricing benefiting the consumer. It is expected to ensure consequential benefits in helping to flatten the energy profile, providing certainty to network operators and thus help reduce network reinforcement requirements whilst also encouraging energy saving actions.</p> <p>However, we understand that whilst P375 is being implemented to enable a mechanism to allow VLPs to record metering at the asset it is also a necessary step in enabling consumers to have much greater control in who supplies their energy. P375 will not allow consumers to select multiple Suppliers with a different organisation supplying their separated measured assets. This is the objective of P379. To ensure benefits of P375 across all energy stakeholders we suggest that P375 and P379 are</p>

Respondent	Response	Rationale
		combined and implemented as a single implementation.
Smart Metering Systems (SMS)	Yes	<p>SMS anticipates several primary benefits to implementing P375:</p> <ol style="list-style-type: none"> 1. Enhanced network balancing – By providing more accurate and granular metering data beyond the boundary, P375 will provide greater visibility and certainty to network operators. This will enable enhanced network balancing, maximising the capacity of existing infrastructure and accelerating connection of low carbon technologies; 2. Accelerated decarbonisation of the UK economy – By implementing individual asset metering, P375 will encourage the development of new commercial models like heating and EV charging as a service, increasing the affordability and uptake of these low carbon technologies. These benefits would be realised in shorter timescales if relevant asset funding mechanisms are in place; 3. Reduced household energy bills – By increasing network visibility, P375 will enable more low carbon technologies to be connected to the UK energy network without the need for costly infrastructure reinforcement. In addition, new tariff services will help make low carbon technologies like heat pumps and EVs more affordable and accessible. This will deliver a win-win of more rapid decarbonisation while keeping customer energy bills low; 4. Encouraging UK economic growth – By encouraging the uptake of new technologies and metering systems, P375 will foster the UK's internal market for installation and construction of low carbon technologies. This timely intervention will dovetail with the UK's coronavirus "Green Recovery" and Government's "Build Back Better" objectives.
Stark	Yes	<p>In principle, agree that P375 will have the potential future benefits that have been detailed in the consultation document.</p> <p>The potential is apparent for Settlement and balancing, building on the wider access and enabling participation in the wider market.</p> <p>With the general goal of Net zero, P375 adds a potential opening for the more significant developments such as renewables & EV markets,</p>

Respondent	Response	Rationale
		whilst also providing a platform for parallel BSC & ESO modifications.
Tonik Energy Ltd	Neutral	No comment provided
Voltalis	Yes	Voltalis agrees that the implementation of P375 is a key step towards the participation of small scale Demand Response aggregation in the Balancing Mechanism. It is necessary for aggregators of small resources such as residential Demand Response aggregators to be able to use their own meters. This is a key step in enabling participation of residential flexibilities in electricity markets, unlocking their much needed flexibility.

Question 17: Do you agree with the Workgroup's assessment of the impact on the BSC Settlement Risks?

Summary

Yes	No	Neutral/No Comment	Other
17	1	4	0

Responses

Respondent	Response	Rationale
Association for Decentralised Energy	Yes	The ADE agrees with the Workgroup's assessment
Association of Independent Meter and Data Agents (AIMDA)	Yes	We agree that due to the replication of process, P375 will impact Settlement Risks 001 and 026.
Association of Meter Operators	No	The numbers of metering systems or the volume of energy are not apparent in the proposals. The risks associated with this significant change have not been explained. The additional costs the industry for the TAA, ELEXON or the BSC Auditor have not been estimated. The level of assurance effort required is unclear.
Centrica	Yes	No comment provided
DETA & EMA	Neutral	No comment provided
Drax BSC Parties	Yes	We have no additional comments at this time.
E.ON Energy Solutions Ltd	Yes	No comment provided
EDF	Neutral	No comment provided
Enel X	Yes	We do not consider that it increases risks very greatly, but it does indeed have the potential to impact settlement in lots of different ways.
Flexitricity	Yes	It is within the implementation phase that the settlement risks identified must be addressed in detail. We do not foresee any fundamental obstacles. We point out that the current P344 route for the capture of VLP volumes contains risks which P375 seeks to address.

Respondent	Response	Rationale
IMServ Europe	Yes	Has consideration been given as to the need to add any new risks to the Risk Register?
NGESO	Yes	We agree with the Workgroup's assessment
RWE Supply & Trading GmbH	Yes	We agree with the Workgroup's assessment of the impact on the BSC Settlement Risks. The performance assurance are robust enough to ensure the integrity of the settlement arrangements as a result of implementation of this modification.
Salient Systems Limited	Yes	No comment provided
Scottish Power	Yes	No comments provided
Sembcorp Energy UK	Yes	No comments provided
Siemens	Yes	As explained in our response to Q10, we believe that the processes applied to ensure HHDA compliance are consistently applied to the SVAA to ensure risks to Settlement are minimised
Smart Metering Systems (SMS)	Yes	We agree that due to the replication of process, P375 will impact Settlement Risks 001 and 026.
Stark	Yes	Agree with workgroup assessment in consultation as there still a lot of unknowns, being a new process, & only continual monitoring & assessment by Performance assurance techniques will be determine which BSC risks are most significantly impacted. Certain assumptions will initially be made e.g. to collection & Settlement data processing.
Tonik Energy Ltd	Neutral	No comment provided
Voltalis	Neutral	No comment provided

Question 18: Do you agree with the Workgroup’s assessment that P375 does impact the European Electricity Balancing Guideline (EBGL) Article 18 terms and conditions held within the BSC?

Summary

Yes	No	Neutral/No Comment	Other
17	0	5	0

Responses

Respondent	Response	Rationale
Association for Decentralised Energy	Yes	The ADE agrees with the Workgroup’s assessment.
Association of Independent Meter and Data Agents (AIMDA)	Yes	We agree that parts of the proposed legal text changes form part of the balancing terms and conditions as per EBGL Article 18 and therefore will need to be consulted upon.
Association of Meter Operators	Neutral	No comment provided
Centrica	Yes	No comment provided
DETA & EMA	Neutral	No comment provided
Drax BSC Parties	Yes	We agree with the Workgroup’s assessment that parts of the proposed legal text changes form part of the balancing terms and conditions as per EBGL Article 18, and as such, will need to be consulted on as part of the Report Phase.
E.ON Energy Solutions Ltd	Yes	No comment provided
EDF	Neutral	No comment provided
Enel X	Yes	We agree with the Workgroup’s reasoning.
Flexitricity	Yes	We strongly believe that P375 facilitates the EBGL objectives as it facilitates the role of BSPs as distinct from BRPs, allows the aggregation of demand and storage facilities, and ensures proper assignment of balancing energy bids by BSPs to BRPs.
IMServ Europe	Neutral	No view
NGESO	Yes	We agree with the Workgroup’s assessment
RWE Supply & Trading GmbH	Yes	The modification will enable the provision of balancing services from assets behind the meter. The proposed arrangements form an integral part of

Respondent	Response	Rationale
		the terms and conditions of balancing as envisaged under the Electricity Balancing Guidelines (EBGL).
Salient Systems Limited	Yes	No comment provided
Scottish Power	Yes	We agree as it directly relates with Balancing units registration, visualisation and route to market, considering also aspects around allocation of imbalances.
Sembcorp Energy UK	Yes	We agree and P375 should be subject to the EBGL art 18 consultation requirements.
Siemens	Yes	No comment provided
Smart Metering Systems (SMS)	Yes	We agree that parts of the proposed legal text changes form part of the balancing terms and conditions as per EBGL Article 18 and therefore will need to be consulted upon.
Stark	Yes	Further opportunities for data aggregators to participate as VLP's.
Tonik Energy Ltd	Neutral	No comment provided
Voltalis	Neutral	No comment provided

Question 19: Do you have any comments on the impact of P375 on the EBGL objectives?

Summary

Yes	No	Neutral/No Comment	Other
6	10	6	0

Responses

Respondent	Response	Rationale
Association for Decentralised Energy	Yes	As stated in the consultation, P375 helps facilitate market entry for Aggregators. It therefore has a positive impact upon delivery of the EBGL objectives.
Association of Independent Meter and Data Agents (AIMDA)	No	We have no further comments
Association of Meter Operators	Neutral	No comment provided
Centrica	No	No comment provided
DETA & EMA	Neutral	No comment provided
Drax BSC Parties	No	We have no additional comments at this time.
E.ON Energy Solutions Ltd	No	No comment provided
EDF	Neutral	No comment provided
Enel X	Yes	By removing barriers to participation by aggregated distributed resources, P375 should have a beneficial impact on EBGL objectives (a), (b), (d), (e) and (f).
Flexitricity	Yes	P375 clearly supports the EBGL objectives, including fostering effective competition, non-discrimination and transparency in balancing markets, enhancing efficiency of balancing, ensuring that procurement is fair, objective, transparent and market-based, avoids undue barriers to entry, and fosters liquidity. P375 is an economic way to ensure proper measurement of and accounting for balancing energy delivered by behind-the-meter assets.
IMServ Europe	Neutral	No view
NGESO	Yes	We have no comments at this stage

Respondent	Response	Rationale
RWE Supply & Trading GmbH	Yes	The modification will better facilitate achievement of the Electricity Balancing Guidelines objectives.
Salient Systems Limited	No	No comment provided
Scottish Power	No	No comment provided
Sembcorp Energy UK	Yes	P375 helps facilitate market entry for Aggregators. As such, it has a positive impact on delivery of the EBGL objectives.
Siemens	No	No comment provided
Smart Metering Systems (SMS)	No	We have no further comments
Stark	No	No comment provided
Tonik Energy Ltd	Neutral	No comment provided
Voltalis	Neutral	No comment provided

Question 20: How long (from the point of approval) would you need to implement P375?

Responses

Respondent	Response
Association for Decentralised Energy	n/a
Association of Independent Meter and Data Agents (AIMDA)	AIMDA members will individually respond to this question
Association of Meter Operators	Not relevant as a trade association
Centrica	This is dependent on the details that still need to be worked through (as per our response to Q23). It is disappointing that this will be developed at implementation stage; this work should have been developed prior to and specified in the Final Modification Report.
DETA & EMA	No comment provided
Drax BSC Parties	In line with our response to Q13 and Q15, after an initial review of the Business Requirements Document, P375 is a material change and is expected to have system and process impacts and associated development costs. Unfortunately, at this time, we are unable to quantify the full magnitude of change, but we currently estimate that we would require at least a 12-month lead time from the point of approval.
E.ON Energy Solutions Ltd	12 – 18 Months. Due to the significant amount of change in the market and mandatory system development this would not be an overall priority deliverable in our current systems.
EDF	No comment provided
Enel X	3-6 months. How quickly we implement it is a commercial decision: it could be done very quickly at increased cost. However, we expect that we would aim to be in a position to use P375 as soon as the central systems are ready.
Flexitricity	We expect to be able to implement all of our required changes within the timescale set out for implementation of P375, provided that the development of code subsidiary documents is done in a timely manner. We cannot speak directly for energy smart appliance manufacturers, who are the most affected amongst equipment manufacturers.
IMServ Europe	12 months
NGESO	None for P375, TBC for consequential changes. To implement P375, we do not expect there will be an impact on NGESO and so there

Respondent	Response
	will be no lead time implications on P375. However, as discussed in Q13, we expect P375 to have consequential changes on NGESO which will take time to implement, this is still to be determined via an impact assessment at this point. Our intention is to align any system changes with the expected go-live of P375 as much as possible.
RWE Supply & Trading GmbH	We do not have a view on the potential lead time. P375 will facilitate new opportunities for balancing services providers once it is implemented.
Salient Systems Limited	6 months elapsed, as long as detailed business and data requirements are agreed and CSD's complete
Scottish Power	This will dependant of the registration process timescales, unable to provide lead time until confirmed.
Sembcorp Energy UK	No comment provided
Siemens	Given P375 will likely overlap with MHHS development, and the ongoing uncertainty around the impact of Covid-19, we would appreciate as early notification as possible.
Smart Metering Systems (SMS)	While earlier implementation would provide certainty to the VLP market and would remove P375 from the wider network investment debate, sufficient time is required to bed-in the changes. Dependent upon the level of system change, SMS anticipates requiring between 6-12 months from point of approval to implement P375.
Stark	Uncertain until specific CSD changes determined.
Tonik Energy Ltd	No comment provided
Voltalis	No comment provided

Question 21: Do you agree with the Workgroup's recommended Implementation Date?

Summary

Yes	No	Neutral/No Comment	Other
15	2	5	0

Responses

Respondent	Response	Rationale
Association for Decentralised Energy	Yes	The ADE agrees with the Workgroup's recommended Implementation Date.
Association of Independent Meter and Data Agents (AIMDA)	Yes	AIMDA agrees with the planned P375 implementation date in February 2022.
Association of Meter Operators	Neutral	No comment provided
Centrica	Neutral	We are very supportive of this being introduced as this will unlock new flexibility providers and will better allow the participation of existing behind-the-meter providers. Ideally, we would like this change to be implemented as soon as feasibly possible. However, before knowing whether we could support the proposed implementation date we would need some of the detail (as per our response to Q23) to determine the cost and timescales of implementing the change, including new and amended data flows. As mentioned previously, this should be developed prior to the implementation stage
DETA & EMA	Yes	Implementation at the soonest opportunity will accelerate access to the envisaged benefits.
Drax BSC Parties	Yes	If Ofgem make a decision by 29 January 2021 then a 12-month lead time can be accommodated in order to meet the Workgroup recommended implementation of 24 February 2022. However, if Ofgem's decision comes between 1 February 2021 and 30 April 2021, the recommended implementation date would be 23 June 2022.
E.ON Energy Solutions Ltd	Yes	No comment provided
EDF	Neutral	No comment provided

Respondent	Response	Rationale
Enel X	Yes	It seems achievable, although sooner is of course better.
Flexitricity	Yes	We would prefer earlier implementation but accept that this may not be achievable.
IMServ Europe	No	The processes that need to be implemented are insufficiently clear at this stage.
NGESO	Yes	Based on the information provided and available at the time of writing, we agree with the workgroup's implementation date.
RWE Supply & Trading GmbH	Yes	The modification should be implemented as soon as practicable.
Salient Systems Limited	No	We would encourage an early as possible implementation date, November 2021?
Scottish Power	Yes	No comment provided
Sembcorp Energy UK	Yes	No comment provided
Siemens	Yes	The implementation date of P375 should be aligned with the implementation date of P379 though we suggest that the two proposals are combined to provide the full benefits of being able to settle "behind the boundary meter" assets by consumer by Supplier in addition to enabling metering to assist VLPs. We believe that February 2022 is a reasonable implementation date.
Smart Metering Systems (SMS)	Yes	As noted in response to question 20, dependent upon the level of system change, SMS agrees with the planned P375 implementation date in February 2022. If we could implement the change several months earlier, while providing adequate lead time to enable implementation, we would support this. Given the importance of the change to supporting consumers and the drive to decarbonisation, we certainly wouldn't want any delay to the timetable set out in the consultation.
Stark	Yes	Would agree in principle with the dates agreed of Feb/June 2022, subject to any Ofgem decision. Would like to see an implementation plan published in advance.
Tonik Energy Ltd	Neutral	No comment provided
Voltalis	Neutral	No comment provided

Question 22: Do you agree that CoP11 should be implemented 12 months ahead of P375?

Summary

Yes	No	Neutral/No Comment	Other
17	2	3	0

Responses

Respondent	Response	Rationale
Association for Decentralised Energy	Yes	Implementing CoP11 12 months ahead of P375 will allow meter manufacturers to develop meters in line with the specification, with benefits both for manufacturers (in terms of clarity about the specifications they need to meet) and market participants (in terms of being able to realise the benefits of P375 immediately upon implementation).
Association of Independent Meter and Data Agents (AIMDA)	Yes	Early implementation of CoP11 will enable the industry to adapt technology, systems and partnership approaches to successfully implement P375.
Association of Meter Operators	Neutral	No comment provided
Centrica	Yes	Providing market participants with the lead time to develop this and prepare for implementation is sensible. We believe that there is appetite now for participation in the Balancing Mechanism at smaller scale and therefore welcome COP11 being implemented as soon as possible.
DETA & EMA	Yes	Suitable metering is essential for any of the benefits to be realised. Product development timelines mean a clear signal to the marketplace (like implementing COP11) is valuable.
Drax BSC Parties	Yes	We support the Workgroup view that, to give Meter manufacturers certainty of what will be required and to allow them time to bring new Meters to market with certainty, that CoP11 should be implemented 12 months ahead of the remainder of P375. This should help to support efficiency by asset owners/operators no longer installing operational Meters during the implementation phase that will not meet the CoP11 standard, thereby reducing the risk of stranded assets.

Respondent	Response	Rationale
E.ON Energy Solutions Ltd	Yes	No comment provided
EDF	Neutral	No comment provided
Enel X	No	We agree that it is useful to implement CoP11 early, so that manufacturers of equipment with embedded metering functionality know what will be required of them. We agree that having it available 12 months ahead would be good. However, there's nothing special about that time frame. In particular, if CoP11 were for some reason delayed, it would not make any sense to delay P375 to maintain the 12 month lead time. Rather, both CoP11 and P375 should be implemented as soon as practicable.
Flexitricity	Yes	Early implementation of CoP11 is essential, and we see no reason why CoP11 should be delayed. The stranded asset cost arising during the period in which energy smart appliance adoption is growing but CoP11 is not yet formally implemented is (i) borne by consumers (ii) exponentially related to the time taken to implement CoP11.
IMServ Europe	Yes	No comments provided
NGESO	Yes	We believe it would be beneficial to have CoP11 implemented as soon as possible to allow industry time to adapt and create products suitable to be used.
RWE Supply & Trading GmbH	Yes	We agree that CoP11 should be implemented 12 months ahead of P375. Implementing the CoP11 arrangements will enable meter providers to develop and deploy the relevant technologies ahead of changes to the settlement systems.
Salient Systems Limited	No	Should be available asap but otherwise metering dispensation applications and decisions could apply in the absence of CoP11.
Scottish Power	Yes	We agree with the principle to give lead time to manufactures to adapt the P375 requirements although those requirements should not be restricting enough for ruling out manufactures from participating in the current basis.
Sembcorp Energy UK	Yes	This will help providers and VLPs assess what changes might be needed and what costs they incur. This will help them get ready on time to participate in P375, should they wish to.
Siemens	Yes	No comment provided

Respondent	Response	Rationale
Smart Metering Systems (SMS)	Yes	Early implementation of CoP11 will enable the industry to adapt technology, systems and partnership approaches to successfully implement P375.
Stark	Yes	<p>COP11 defines the requirements & specifications of the metering that manufacturers to deliver and so having this approved in advance will also enable VLP's to determine the extent of any new installations required to ensure P375 fulfils it's potential.</p> <p>It will also potentially enable agents to have access to asset metering that they will require testing ahead of implementation.</p>
Tonik Energy Ltd	Yes	<p>It is sensible that CoP11 be implemented 12 months ahead of P375, so manufacturers can ensure that their asset meters are compliant and can be approved by the BSCCo. This will allow for assets to be installed prior to the implementation of P375 and then be registered as soon as P375 goes live.</p> <p>However, the requirements state in section 3.2, point 12 that the asset meters must be installed and maintained by a MOA or MOA Alternative. This would imply that only existing MOA could install approved asset meters applicable to P375 prior to the go live of the change. We are concerned that this would give an unfair advantage to existing MOA's over non BSC parties (MOA Alternative).</p> <p>We would like the requirements to allow for asset meters previously installed by an MOA alternative before they are BSC qualified parties to be registered by the VLP as AMSID pairs to SVAA asset register to ensure that existing MOA's are not advantaged before the additional role of MOA Alternative is created.</p>
Voltalis	Neutral	No comment provided

Question 23: Do you agree that convening a group of industry experts during the Implementation Phase will assist with developing P375's CSDs?

Summary

Yes	No	Neutral/No Comment	Other
18	0	4	0

Responses

Respondent	Response	Rationale
Association for Decentralised Energy	Yes	This approach provides a useful opportunity for industry input.
Association of Independent Meter and Data Agents (AIMDA)	Yes	AIMDA strongly supports additional industry engagement during the implementation phase to support the seamless transition towards P375.
Association of Meter Operators	Yes	This is absolutely essential. There is significant detail missing from these documents. The missing detail, ambiguity and inconsistencies will need resolution.
Centrica	Yes	<p>This is required as there are areas which have insufficient detail at this time. Potential questions to consider in work group:</p> <ul style="list-style-type: none"> • Clarity on process to link/de link to boundary MPAN? • Will new flows be required? • Who will be responsible for the VLP metering system from a health & safety perspective? • VLP asset registration – what happens if the registration is incomplete? • What is the process for agents to accept/reject appointments? • Will the VLP asset MOA be required to contract with customer or MOA? • What would be the process to aggregate the data if there is a metering fault with the primary MPAN?
DETA & EMA	Neutral	No comment provided

Respondent	Response	Rationale
Drax BSC Parties	Yes	We agree that having an expert group to develop Code Subsidiary Documents (CSDs) is a sensible approach and proved successful for P344.
E.ON Energy Solutions Ltd	Yes	No comment provided
EDF	Neutral	No comment provided
Enel X	Yes	This seems a sensible way to get broad input while avoiding delay.
Flexitricity	Yes	We believe that this would greatly improve the resulting CSDs. A broad mix of expertise is required, covering electrical arrangements at industrial and commercial premises, energy smart appliances, metering systems and the BSC itself.
IMServ Europe	Yes	<p>There is still a significant amount of detail to be captured particularly around Party Agent activities and an expert group should ensure these are correctly reflected in the CSDs – people working the process should form a good barometer of what works and what doesn't.</p> <p>Since we have been actively involved in both P375 and other related modifications such as P379, P344 and P354, we would welcome such involvement and feel we could bring a high level of expertise to such a group. DCE also...</p>
NGESO	Yes	We support this approach for developing the CSDs.
RWE Supply & Trading GmbH	Yes	There is scope for innovation in the development and deployment of asset metering and associated settlement arrangements. An industry expert group will help to guide market participants during implementation phase.
Salient Systems Limited	Yes	We believe this will be an important requirement
Scottish Power	Yes	No comments provided
Sembcorp Energy UK	Yes	Industry input is key for a proper implementation.
Siemens	Yes	No comment provided
Smart Metering Systems (SMS)	Yes	SMS strongly supports additional industry engagement during the implementation phase to support the seamless transition towards P375. SMS, as one of the UK's largest independent suppliers of

Respondent	Response	Rationale
		smart meters, would be interested with assisting with the development of the CSDs.
Stark	Yes	If fully representative of all parties & agents likely to be impacted by CSD developments. It will also provide an opportunity, if taken, for some of the text to be updated & may make the implementation more efficient if group contains members who are familiar with relevant CSD documents.
Tonik Energy Ltd	Neutral	No comments provided
Voltalis	Neutral	No comment provided

Question 24: Do you agree with the Workgroup’s initial unanimous view that P375 does better facilitate the Applicable BSC Objectives than the current baseline?

Summary

Yes	No	Neutral/No Comment	Other
17	1	4	0

Responses

Respondent	Response	Rationale
Association for Decentralised Energy	Yes	The ADE agrees with this view. In particular, P375 better facilitates Objectives (b), (c) and (e) than the current baseline by, respectively, allowing NGENSO more options for operation of the Transmission System, increasing competition, and facilitating market entry for Aggregators, in line with the EBGL’s objectives.
Association of Independent Meter and Data Agents (AIMDA)	Yes	AIMDA strongly supports the workgroup’s view that P375 will more effectively deliver the BSC objectives.
Association of Meter Operators	No	The existing provision of BSCP550 provides much of the capability proposed in P375. The benefits described are not clear or anything like certain The costs are not robust. There does not seem to have been any input from industry stakeholders for their costs.
Centrica	Yes	We support this modification as we believe this could provide opportunities for untapped sources of flexibility. The new COP11 is very welcome and should facilitate participation of assets of all scale and sizes. However, we note the high cost for implementation, which we believe needs evidencing further along with a more rigorous analysis of the benefits. We also note that more detail is needed to understand the interaction with different BSC parties.
DETA & EMA	Neutral	No comment provided
Drax BSC Parties	Yes	Because the Boundary Meter measures total flows for the site and not just for assets such as Electric Vehicle (EV) charging, Virtual lead Parties (VLPs) have experienced difficulties in accurately

Respondent	Response	Rationale
		<p>forecasting the Final Physical Notification (FPN) which is a significant blocker for the provision of Balancing Services.</p> <p>P375 enables Settlement to acquire data using metering behind the Boundary Point, at the asset, which is delivering the Balancing Service. By allowing this, the VLP can install metering or use existing metering which can isolate the flows, which the VLP can therefore forecast accurately in its FPN.</p> <p>Suppliers will also benefit through more accurate FPN and delivered volumes. If P379 is to be developed, we believe that use of 'behind the Meter' metering under P375 should be mandated as part of any solution where there are assets behind the meter as opposed to a commercial choice.</p> <p>P375 has a positive impact on Applicable BSC Objective (b) as it facilitates the participation of third party Aggregators and customers to the provision of Balancing Services which increases the options available to National Grid ESO when balancing the System. P375 also has a positive impact on Objective (c) because the change encourages more participation in the market, which increases competition. There is also a positive impact on Objective (e). P375 will facilitate participation in balancing products, including TERRE and the BM.</p>
E.ON Energy Solutions Ltd	Yes	No comment provided
EDF	Neutral	No comment provided
Enel X	Yes	We agree with the Workgroup. The main impact is to remove barriers to participation. This directly benefits (c) and (e), and, as a knock-on effect benefits (b).
Flexitricity	Yes	The purpose of P375 is to render verifiable, accurate, objective and noise-free the volumes of balancing services delivered by a very wide range of current and future asset types, and to do so in a commensurate and economic way. This increases the GB System Operator's pool of flexible resources, supporting objective (b), and increases both the volume of competition and (through verifiability) its effectiveness, supporting objective (c). It also supports compliance with the EBGL, objective (e), as demonstrated in our response to Q19.

Respondent	Response	Rationale
IMServ Europe	Yes	No comments provided
NGESO	Yes	We agree with the workgroup in this regard.
RWE Supply & Trading GmbH	Yes	We agree with the view of the workgroup that P375 does better facilitate the Applicable BSC Objectives than the current baseline.
Salient Systems Limited	Yes	No comment provided
Scottish Power	Yes	No comments provided
Sembcorp Energy UK	Yes	We agree as per the WG assessment.
Siemens	Yes	Although we believe that P375 will be positive for Applicable BSC Objective (c), the implementation of P379 with P375 (or combining the two proposals) would further promote competition in the sale and purchase of electricity.
Smart Metering Systems (SMS)	Yes	SMS strongly supports the workgroup's view that P375 will more effectively deliver the BSC objectives.
Stark	Yes	As detailed in the consultation
Tonik Energy Ltd	Neutral	No comments provided
Voltalis	Neutral	No comment provided

Question 25: Do you agree with the Proposer's and Workgroups view that P375 should not be a Self-Governance Modification?

Summary

Yes	No	Neutral/No Comment	Other
19	0	3	0

Responses

Respondent	Response	Rationale
Association for Decentralised Energy	Yes	P375 impacts the market and competition, so should not be treated as a Self-Governance modification.
Association of Independent Meter and Data Agents (AIMDA)	Yes	AIMDA agrees with both the proposer and workgroup that P375 should not be a self-governance modification.
Association of Meter Operators	Yes	No comment provided
Centrica	Yes	This could have a significant impact on the market and therefore should not be self-governance.
DETA & EMA	Neutral	No comment provided
Drax BSC Parties	Yes	P375 is a material change impacting multiple parties, processes and systems. It is also likely to have a material effect on competition by supporting entry for consumers to participate in the BM (and potentially TERRE).
E.ON Energy Solutions Ltd	Yes	No comment provided
EDF	Yes	No comment provided
Enel X	Yes	Removing barriers to participation increases competition, so it can't be eligible for self-governance.
Flexitricity	Yes	As stated in the consultation document, P375 is simple in concept but complex to implement within the BSC. The capital requirements are significant and it will have an impact (though a positive one) on many different BSC Parties. It is therefore not suitable for self-governance.
IMServ Europe	Yes	No comments provided
NGEOS	Yes	We agree with the workgroup in this regard.

Respondent	Response	Rationale
RWE Supply & Trading GmbH	Yes	The scale and scope of the proposed changes means that this modification should not be subject to self-governance.
Salient Systems Limited	Yes	No comment provided
Scottish Power	Yes	No comments provided
Sembcorp Energy UK	Yes	No comments provided
Siemens	Yes	No comment provided
Smart Metering Systems (SMS)	Yes	SMS agrees with both the proposer and workgroup that P375 should not be a self-governance modification.
Stark	Yes	As discussed P375 is likely to have a material effect on Self-governance criterion (a)(ii) related to competition by reducing a perceived or operational barrier to entry for some consumers to participate in the BM, therefore agree it should not be progressed as a Self-Governance modification.
Tonik Energy Ltd	Neutral	No comments provided
Voltalis	Neutral	No comment provided

Question 26: Do you have any further comments on P375?

Summary

Yes	No
10	12

Responses

Respondent	Response	Comments
Association for Decentralised Energy	No	N/A
Association of Independent Meter and Data Agents (AIMDA)	No	N/A
Association of Meter Operators	Yes	<p>I am concerned at the independence of ELEXON acting as the Code Administrator of the BSC is adding LinkedIn posts, etc. advocating how great the P375 proposal is. The Code Administrator should be acting in a neutral capacity allowing stakeholders to provide a response and the BSC Panel to act on the information presented.</p> <p>The Business requirements document includes a section on 'assumptions'. At this stage, these assumptions should all have led to requirements. It is not clear what purpose this document serves.</p>
Centrica	No	N/A
DETA & EMA	Yes	<p>We are supportive of the objectives of P375 and believe the changes proposed are a suitable way of achieving these goals. Maintaining the proposed implementation timeline is important to unlocking the benefits outlined within a reasonable timescale.</p> <p>P375 will impact the market at several levels:</p> <ul style="list-style-type: none"> • TSOs • DSOs • Aggregators and • Asset and site owner/operators <p>If the value proposition is not sufficiently strong and clear to the owners of the assets we hope to engage, this will severely hinder roll out in the market-place.</p>

Respondent	Response	Comments
		<p>The opportunities for stakeholders like EV charge point operators, small-businesses and domestic users will therefore need to be explained in a way that is accessible to entities that do not normally participate in reserve service markets. We therefore recommend that in parallel with changes to the code and metering regulations that a programme of education and communication is considered to ensure the potential benefits are fully realised. Whilst potential VLPs like aggregators have an incentive to do this, impartial generally available advice may increase the number of entities coming forward to participate in the schemes P375 is expected to enable.</p> <p>Energy Managers' interest in using asset based DSR and batteries to participate in reserve services markets is growing. However, currently there is a lack of knowledge about how to access potential value and overcome the barriers that P375 seeks to remove.</p> <p>One of DETA's core objectives is to inform its members and highlight potential opportunities of this type and we would be happy to support any education programme.</p> <p>As a first step, by collaborating with the Energy Managers Association (EMA) we will explain P375's potential benefits and canvas the views of the organisations 5000 strong community who collectively purchase £8bn worth of energy per year. We would be delighted to share the results of this activity with the P375 work group.</p>
Drax BSC Parties	Yes	<p>1) Communications will be via the DTN or 'by other electronic means as agreed' (e.g. the two companies involved agree to use P-Flows). Our preference would be for the use of DTN rather than P-Flows because they're used across a broad range of industry processes and are well understood by industry parties, relatively straightforward to implement and should future enhancements be required, DTC changes can typically be progressed via IREG and MDB within short timescales.</p> <p>2) We favour participation from third party aggregators that use meters behind the boundary meter for which Suppliers will benefit through more accurate FPN and delivered volumes.</p>

Respondent	Response	Comments
E.ON Energy Solutions Ltd	No	No comments provided
EDF	Yes	As we have mentioned in previous questions, we support improvements to the BSC that enables an increase available settlement data which can facilitate future benefit. Our immediate reservations is that P375 benefits those parties controlling the asset and leaves imbalance liability with the primary supplier.
Enel X	No	No further comments
Flexitricity	Yes	Preparing P375 for consultation required eight workgroups, which were in general well attended, with membership from a wide variety of types of organisation, including "traditional" suppliers, metering agents, aggregators and merchant generators. Attendees also included energy smart appliance manufacturers and smart home companies. There was considerable discussion over many of the details of P375. However, despite the diversity of perspectives, P375 received unanimous support from workgroup members. We believe the breadth of support is as material as the unanimity.
IMServ Europe	Yes	<p>We believe this will be impacted by REC and close to MHHS so is this future proof?</p> <p>We believe having Multiple VLPs within a single site is a risk based on previous experience of shared metering and complex sites.</p> <p>Can consideration be given to conducting end to end testing prior to implementation?</p>
NGESO	Yes	<p>We have some general comments that may be worth clarifying;</p> <ul style="list-style-type: none"> The AMSID register that will be held/managed by SVAA, for the purposes of industry efficiency and transparency, it would be worth considering how visible this register will be to industry participants and what purposes this data could be used for.
RWE Supply & Trading GmbH	No	No comments provided
Salient Systems Limited	Yes	<p>Would prefer to see P376 and P375 progressed together.</p> <p>P376 also has significant value now and will likely contribute to the delivery of a wider variety of</p>

Respondent	Response	Comments
		<p>flexibility options into the future. In our view P376 will be easier and quicker to implement and assure than P375.</p> <p>Issue 88 (Complex Meters) that is under review currently at Elexon will have outputs that may be relevant to final identification of P375 detailed data requirements and data interface specifications between parties. Issue 88 will attempt to identify and advise upon a standardised codification of data required at Complex Site Supplementary forms that are communicated by MOA's to HHDC. This supplementary data is required by the HHDC in order to apply appropriate differencing rules to consumption data recorded at Complex site meters in order to calculate consumption data that enters settlement. Decisions at Issue 88 upon the data contents and formats (possible formal flow file ?) of supplementary data interfaces to better address Complex Site requirements may inform similar requirements at P375 where differencing methods must be applied.</p>
Scottish Power	No	No comments provided
Sembcorp Energy UK	No	No comment provided
Siemens	No	No further comments
Smart Metering Systems (SMS)	Yes	<p>Please see attached with our consultation a letter that sets out our support for the proposed changes. As detailed in our responses to this consultation, SMS strongly supports the P375 proposals, noting that these deliver substantial benefits to UK energy customers, unlock significant opportunities to innovate in the UK energy industry, and will accelerate more rapid decarbonisation of our economy.</p> <p>We would welcome the opportunity to contribute additional information and insight to Elexon's implementation of P375.</p>
Stark	No	No comment provided
Tonik Energy Ltd	Yes	<p>Tonik Energy is fully supportive of P375 which will enable small behind the meter assets to be amalgamated and participate in the BM and participate in other future services, such as those offered by Distribution System Operators.</p> <p>We are also supportive of P379 which will allow energy to be independently supplied directly to</p>

Respondent	Response	Comments
		<p>assets behind the meter - which P375 is a pre-requisite for.</p> <p>Both these changes will allow greater competition and innovation in the market and support a flexible energy system and further the government aims for net zero emissions by 2050.</p>
Voltalis	No	No comment provided