

4.3 CP Form

Change Proposal – BSCP40/02	CP No: <i>Version No: 1.0</i> <i>(mandatory by BSCCo)</i>
Title (mandatory by originator) <p>CoP4 clarification of BSC Party responsibility for Commissioning of measurement transformers that the BSC Party adopts.</p>	
Description of Problem/Issue (mandatory by originator) What is the Issue? (Summary) <p>There is misalignment between the obligations for Commissioning of non-BSC Party owned measurement transformers, as outlined in Code of Practice 4 (CoP4), and some industry operational processes.</p> <p>This Change Proposal (CP) seeks to amend CoP4 to clarify that a BSC Party will be responsible for the Commissioning of any measurement transformers that will be adopted into that BSC Party's ownership at a later date.</p> <p>Detail of the Issue and relation to Issue 72</p> <p><u>Issue 72 'Ensuring measurement transformer assets installed by a Non-BSC Party are successfully Commissioned within BSC timescales'</u> was raised by SSE Ltd on 11 September 2018, aiming to address issues in the Commissioning process where measurement transformers installed by a non-BSC Party are not owned by BSC Parties, hindering the end-to-end Commissioning process, which in turn poses a risk to Settlement. Issue 72 members contend that obligations CoP4 places on the Registrant, via its appointed MOA, for Commissioning of measurement transformers owned by non-BSC Parties are not always practical or possible to fulfil.</p> <p>For instance, issues were identified in the process where measurement transformer assets have been installed by Independent Connection Providers (ICPs), Building Network Operators (BNOs) or were owned by the customer. The Issue Group noted issues included (but may not be limited to) heightened operational safety risks and the need for further accreditation for MOAs working on these sites.</p> <p>Due to ownership of the assets, access to the CTs may be challenging due to lack of authorisation or ability to contact the Equipment Owner.</p> <p>Additionally, the group highlighted that neither the Registrant nor the MOA has a commercial relationship with the ICP, so in the case of any issues arising with the Metering Equipment from installation, the Registrant is unable to ensure the ICP corrects the issues that it introduced at the site.</p>	

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

Under the Competition in Connections Code of Practice (CiCCoP) ICPs operate in the market to complete the contestable activities of connections. They do not own and operate the networks. Therefore, all new installed assets must be adopted by the Local Distribution System Operator (LDSO).

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

Background

CoP4 describes the requirements for Commissioning Metering Equipment for Settlement purposes.

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

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

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

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

Proposed Solution (mandatory by originator)

This change will amend CoP4 to clarify that a BSC Party will be responsible for the Commissioning of any measurement transformers that the BSC Party has agreed to adopt.

In practice, if measurement transformers are installed by an ICP (or any other non-BSC Party) and will later be adopted by an LDSO (or any other BSC Party), the responsibility for ensuring Commissioning requirements are met would fall on the LDSO under the proposed solution.

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

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

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

Justification for Change (mandatory by originator)

This proposal would create greater clarity for BSC Parties and improve the efficiency of the Commissioning process by:

- Providing clear instruction that will reduce confusion among BSC Parties by providing clear indication of expected responsibilities and obligations for Commissioning under the BSC and reducing potential ambiguity within CoP4;
- Improving industry confidence in the Commissioning process and reducing the risk of involuntary BSC non-compliance; and

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

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

[BSC Section L – Metering](#)

Estimated Implementation Costs (mandatory by BSCCo)

£360 (one ELEXON Working Day) to implement the necessary CoP4 and associated guidance note changes.

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

[Code of Practice 4 'The Calibration, Testing and Commissioning Requirements of Metering Equipment for Settlement Purposes'](#)

Impact on Core Industry Documents or System Operator-Transmission Owner Code (mandatory by originator)

As this change is to increase the practicality of obligations under the BSC only, other codes will not be impacted.

Related Changes and/or Projects (mandatory by BSCTCo)

[Issue 72 'Ensuring measurement transformer assets installed by a Non-BSC Party are successfully Commissioned within BSC timescales'](#)

Requested Implementation Date (mandatory by originator)

20 November 2020 as part of the November 2020 BSC Release

Reason:

This implementation approach will allow market participants to update their internal processes and documentation between the decision date and go-live date for this CP.

Version History (mandatory by BSCTCo)

Version 1.0 of this CP was raised on 27 January 2020.

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Attachments: Y – Proposed redlining changes to CoP4