

CP Assessment Report



Committee

Imbalance Settlement Group (ISG) and Supplier Volume Allocation Group (SVG)

Recommendation

Approve

Implementation Date

20 November 2020
(November 2020 Release)

CP1528 'CoP4 clarification of BSC Party responsibility for Commissioning of measurement transformers that the BSC Party adopts'

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About This Document

This document is the Change Proposal (CP) Assessment Report for CP1528 which ELEXON will present to the ISG and SVG at their respective meetings on 7 April 2020. The ISG and SVG will consider the proposed solution and the responses received to the CP Consultation before making a decision on whether to approve CP1528.

There are three parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, and proposed implementation approach. It also summarises the ISG and SVG's initial views on the proposed changes.
- Attachment A contains the proposed redlined changes to deliver the CP1528 solution.
- Attachment B contains the full responses received to the CP Consultation.

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1 Why Change?

Background

Commissioning requirements

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

The Registrant of a Metering System is responsible for ensuring that the Metering Equipment that makes up that Metering System is Commissioned for Settlement purposes. Registrants discharge this responsibility by appointing a Meter Operator Agent (MOA) to the Metering System.

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) in Half Hourly (HH) sites sits with the Metering 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), Customer or Third Party Generator) then the responsibility remains with the Registrant.

CoP4 paragraph 5.5 'Commissioning' states 'Where measurement transformers are not owned by a BSC Party the Registrant, via its appointed MOA, shall be responsible for the Commissioning of all Metering Equipment.' 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.

Independent Connection Providers

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 distribution networks. Therefore, all new installed assets must be adopted by a Distribution Network Operator (DNO).

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

What is the Issue?

Where Metering Equipment has been installed by a non-BSC Party, the BSC places obligations on the Registrant to ensure that its MOA performs the required Commissioning of all Metering Equipment in accordance with CoP4, which includes Commissioning and testing of measurement transformers (current transformers (CTs) and voltage transformers (VTs)).

The current drafting of CoP4 states that Commissioning of measurement transformers owned by a BSC Party will be that BSC Party's responsibility. However, there is no guidance regarding situations where measurement transformers installed by a non-BSC Party are later adopted by a BSC Party. This lack of guidance contributes to a perceived



What is a Registrant?

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.



What is a Meter Operator Agent?

Meter Operator Agent (MOA) means a Party Agent appointed in accordance with Section L to install, Commission, test and maintain, and rectify faults in respect of, Central Volume Allocation (CVA) Metering Equipment and/or Supplier Volume Allocation (SVA) Metering Equipment.



What is an Equipment Owner?

In relation to a Metering System, a person which is the owner of Metering Equipment comprised in that Metering System but is not the Registrant of that Metering System.

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misunderstanding of the responsibilities under the BSC related to Commissioning where a BSC Party has agreed to adopt equipment.

Metering Equipment which has not been fully Commissioned at installation may be significantly inaccurate and could have significant error associated with it, which can remain undetected for a considerable amount of time. This poses a significant risk to Settlement.

Issue 72

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

As detailed in the Issue Report presented to the BSC Panel ([290/09](#)) that captures the work of the Issue 72 group, members discussed how the obligations that CoP4 currently places on the Registrant via its appointed MOA for Commissioning of measurement transformers owned by non-BSC Parties are not always practical or possible to fulfil.

As no BSC Parties came forward to raise the recommendations of the Issue 72 Group, ELEXON agreed to raise CP1528 on behalf of the Issue Group.

Issues with measurement transformers owned by non-BSC Parties

Discussions focused on issues faced in the Commissioning process when measurement transformer assets have been installed by ICPs.

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

In other cases, the CTs may not be accessible due to lack of authorisation or ability to contact the Equipment Owner. Issues identified included (but may not be limited to) heightened operational safety risks and the need for further accreditation for MOAs working on these sites.

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

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

Under the 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 Licensed Distribution System Operator (LDSO).

The Issue group noted that a solution to difficulties in obtaining Commissioning records within BSC timescales may rest on reviewing and utilising the lines of communication between LDSOs (BSC Parties), and ICPs (non-BSC Parties).

Proposed solution

CP1528 seeks to 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.

Change Proposal CP1528 proposes to 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 under the BSC and reducing potential ambiguity within CoP4; and
- Improving industry confidence in the Commissioning process and reducing the risk of involuntary BSC non-compliance.

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 (or any other BSC Party) under the proposed CP1528 solution.

Clarificatory changes

This CP 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.

Finally, wording has been added to clarify that where Metering Equipment is to be comprised within a CVA Metering System then the Registrant (via its appointed MOA) will remain responsible for Commissioning. Metering Equipment comprised within a CVA Metering System is required to be Commissioned prior to energisation. As the transfer of responsibility for Commissioning adopted measurement transformers does not commence until energisation, it is not practical for the proposed solution to apply to Metering Equipment registered in CVA Metering Systems.

Footnote

CP1528 also adds a footnote regarding the instruments used for Commissioning (footnote 7). The amendment shall confirm responsibility and traceability of the Commissioning tests in the case of an adoption agreement between a BSC Party and an ICP.

Definition of Equipment Owner

To facilitate the solution, CP1528 will also introduce the definition of an 'Equipment Owner' in CoP4 Section 4 that is already present in [BSC Section X, Annex X-1 'General Glossary'](#) that reads as follows;

"means, in relation to a Metering System, a person which is the owner of Metering Equipment comprised in that Metering System but is not the Registrant of that Metering System"

This will add clarity to the process, rectifying responsibility in respect of the identified Issue relating to ICPs.

Proposer's rationale

The Issue 72 group believe this change will provide a greater degree of clarity and improve the provision of Commissioning records under BSC timescales by removing a potential area of ambiguity. For the avoidance of doubt, ELEXON is acting as the Proposer of this CP1528 on behalf of the Issue 72 group members.

The Issue group believes this would better reflect the practicalities of securing Commissioning records and CT/VT calibration certificates by making use of the commercial relationship that exists between ICPs and LDSOs to ensure that these records are obtained within BSC timescales.

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'](#).

Proposed redlining

The proposed redlining for this CP1528 can be found in Attachment A of this paper. The proposed redlining attached was developed as part of Issue 72 and was agreed as suitable to deliver the intent of the CP, prior to this CP being raised.

3 Impacts and Costs

Central impacts and costs

Central impacts

The solution to this CP only requires changes to BSC documentation. Therefore, there are no BSC Central System impacts.

CP1528 require changes to [Code of Practice 4 'The Calibration, Testing and Commissioning Requirements of Metering Equipment for Settlement Purposes'](#).

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none">Code of Practice 4: The Calibration, Testing and Commissioning Requirements of Metering Equipment for Settlement PurposesCoP4 Guidance	<ul style="list-style-type: none">None

Central costs

The central implementation costs for CP1528 will be approximately £360 to make the required document change.

Impact on BSC Settlement Risks

This change is expected to reduce Risk 003 'SVA Metering Equipment is installed, programmed or maintained incorrectly including where Commissioning is performed incorrectly or not at all' by clarifying BSC Party responsibility for installations by non-BSC Parties that they have agreed to adopt and thus improving on the baseline.

BSC Party & Party Agent impacts and costs

Participant impacts

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
Distribution System Operators (DSOs)	This change will clarify existing responsibilities under the BSC, therefore the impact is expected to be relatively minimal, although BSC Parties and Party Agents may need to update or amend internal operational documentation to reflect the clarification
Supplier	
Generator	
CVA MOA	
HHMOA	
NHHMOA	

No other BSC Parties or Party Agents are expected to be impacted but we seek confirmation of this through the CP Consultation.

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4 Implementation Approach

Recommended Implementation Date

This CP is recommended for implementation on **20 November 2020** as part of the November 2020 BSC Release.

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. We will request Market Participant views on the implementation approach for CP1528 as part of the CP consultation.

SVG's initial views

The SVG considered CP1528 at its meeting on 4 February 2020 ([SVG228/06](#)), noting all recommendations without identifying any additional questions for consultation.

In response to a question over whether there had been DSO representation in the Issue group, ELEXON responded that there had been.

ELEXON clarified that under the CP1528 solution responsibility would commence on adoption of any Metering Equipment.

ISG's initial views

The ISG considered CP1528 at its meeting on 4 February 2020 ([ISG226/02](#)), noting all recommendations without identifying any additional questions for consultation.

A Member queried whether costs incurred by rectifying sub-standard work by a non-BSC Party would fall on the BSC Party that adopts the equipment. ELEXON responded that these costs would have to be covered by the BSC Party that has adopted the equipment but that the BSC Party could ensure that sub-standard work did not take place by specifying minimum standards in its adoption agreement with the third party.

One Member questioned whether there would be any incentive for an ICP to perform Commissioning to BSC standards. ELEXON responded that the adoption agreement between an LDSO and ICP provided a means of control and the member was satisfied that this commercial contract provided an effective control.

One Member queried whether it was strictly necessary to include new wording in CoP4 that clarified the lack of change in requirements for CVA Metering Systems.

ELEXON responded that Metering Equipment within CVA Metering Systems is required to be Commissioned prior to energisation. As the transfer of responsibility for Commissioning adopted measurement transformers does not commence until energisation, it is not practical for the proposed solution to apply to Metering Equipment registered in CVA Metering Systems. To avoid confusion and reduce the potential for ambiguity within CoP4, it was considered prudent to clarify that CVA requirements are not changing as a result of CP1528.

ELEXON further clarified that requirements introduced by [P283 'Reinforcing the Commissioning of Metering Equipment Processes'](#) would not be altered as a result of this Change Proposal where Metering Equipment is owned by a BSC Party. Rather, this CP is aiming to improve on the baseline in situations where Metering Equipment are not owned by a BSC Party but is later adopted by one.

6 Industry Views

This section summarises the responses received to the CP Consultation. You can find the full responses in Attachment B.

Summary of CP1528 CP Consultation Responses

Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1528 proposed solution?	9	0	0	0
Do you agree that the draft redlining delivers the intent of CP1528?	9	0	0	0
Will CP1528 impact your organisation?	4	5	0	0
Will your organisation incur any costs in implementing CP1528?	0	9	0	0
Do you agree with the proposed implementation approach for CP1528?	9	0	0	0
Do you have any further comments on CP1528?	1	8		

There were nine responses to the consultation for CP1528, with respondents representing Suppliers, DNOs, Supplier Agents and one Trade Body. Respondents were unanimous in their support of the CP1528 solution and the draft redlining that would deliver it.

Impacts & costs

Four respondents identified impacts, but described these as minor with some business process changes that would be incurred by the change. A DNO noted that they had already implemented a process to address this particular issue. Two respondents classed the impacts as positive in respect to the availability of commissioning records and improved understanding of responsibilities.

No significant costs were identified by any respondents and respondents unanimously agree with the implementation approach.

Process & solution

One respondent asked for clarification on processes relating to notification from the Supplier to the MOA once a site has been adopted. ELEXON responded to clarify that a process for an MOA to be informed that measurement transformers are customer owned already exists through the D0382 process. The MOA will be passed the Commissioning information that they need to complete their own Commissioning via the D0383 flow as per the normal process.

It was also noted that CP1528 does not address concerns with regards to Building Network Operators (BNO), with ELEXON responding to clarify that issues with measurement transformers installed by BNOs was discussed by the Issue 72 group who were unable to find an appropriate BSC solution to this issue. CP1528 was recommended to take forward

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the recommendations principally relating to ICPs, with BNO concerns being out of scope of this change.

A respondent also commented that they felt CoP4 could be clearer that for adopted SVA Metering Systems it is not a requirement of the Registrant to ensure the equipment is Commissioned, however they accepted that CP1528 improves on the baseline in this regard.

Suggestion for solution expansion

For Commissioning of measurement transformers that are not to be adopted by a BSC Party, CoP4 states that responsibility lies with the Registrant via its appointed MOA. Should the Registrant wish to discharge this responsibility to a third party other than the MOA they can do so but remain responsible under the BSC for ensuring that the Metering Equipment is Commissioned to the standards defined in CoP4.

One respondent, although supportive of the proposed solution, suggested that Section 5.5 Commissioning could be amended to recognise that the MOA may not be required to complete Commissioning of the Metering Equipment where measurement transformers are not adopted at a later date.

ELEXON responded to confirm that, given CP1528 is concerned with improving the baseline of information provision where measurement transformers are installed by a non-BSC Party and later adopted by a BSC Party, this would fall out-of-scope of the change.

While not dismissing the principle under which the respondent's change was suggested, ELEXON also noted that currently under Performance Assurance, the MOA would still be responsible for producing Commissioning records (for example during a Technical Assurance Agent audit). As such it is likely that the respondents suggested amendment would potentially require wider changes to CoP4 along with due consideration of the impacts on market participants and BSC documents and processes to support.

7 Recommendations

We invite you to:

- **APPROVE** the proposed changes to Code of Practice 4 for CP1528; and
- **APPROVE** CP1528 for implementation on 20 November 2020 as part of the November 2020 BSC Release.
- **NOTE** that CP1528 will be presented to the ISG and SVG on 7 April 2020 for decision.

Appendix 1: Glossary & References

Acronyms

Acronyms used in this document are listed in the table below.

Acronyms	
Acronym	Definition
BEIS	Department for Business, Energy & Industrial Strategy
BSC	Balancing and Settlement Code
BNO	Building Network Operator
CiCCoP	Competition in Connections Code of Practice
CoP4	Code of Practice 4' The Calibration, Testing and Commissioning Requirements of Metering Equipment for Settlement Purposes'
CT	Current Transformer
DCUSA	Distribution Connection and Use of System Agreement
DSO	Distribution System Operator
EHV	Extra High Voltage
ICP	Independent Connections Provider
ISG	Imbalance Settlement Group
HV	High Voltage
LDSO	Licensed Distribution System Operator
MOA	Meter Operator Agent
MRA	Master Registration Agreement
NERS	National Electricity Registration Scheme
PAB	Performance Assurance Board
SVG	Supplier Volume Allocation Group
VT	Voltage Transformer

External links

A summary of all hyperlinks used in this document are listed in the table below.

All external documents and URL links listed are correct as of the date of this document.

External Links		
Page(s)	Description	URL
3	P283 'Reinforcing the Commissioning of Metering Equipment Processes'	https://www.elexon.co.uk/mod-proposal/p283/
4	Engineering Recommendation G87	http://www.ena-eng.org/ENA-Docs/D0C3XTRACT/ENA_EREC_G87_Extract_18090_2050443.pdf

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External Links		
Page(s)	Description	URL
4	UK Power Networks BNO guidance document	https://www.ukpowernetworks.co.uk/internet/en/help-and-advice/documents/UKPN BNO Guide.pdf
5	Electricity Act 1989.	https://www.legislation.gov.uk/ukpga/1989/29/contents
5	The Electricity and Gas (Internal Markets) Regulations 2011	http://www.legislation.gov.uk/uksi/2011/2704/contents/made
6	CP1505 'Off site Commissioning of current transformers'	https://www.elexon.co.uk/change-proposal/cp1505/
6	Performance Assurance Board Paper PAB209/05	https://www.elexon.co.uk/documents/groups/pab/2018-meetings-pab/209-june/pab209-05-proposal-to-write-to-ciccop-regarding-icp-commissioning-concerns/
7	National Electricity Registration Scheme (NERS)	https://www.lr.org/en/utilities/national-electricity-registration-scheme-ners/register-ners-accredited-provider/
7	Competition in Connections (CiC) Code of Practice (CoP)	http://www.connectionscode.org.uk/assets/files/CiC CoP final April2017.pdf