
Request to extend the review of Metering Codes of Practice (Issue 93)

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

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Purpose of paper **Decision**

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Summary **Issue 93 was raised in January 2021 to review the BSC Metering Codes of Practice. This paper invites the ISG and SVG to note the progress of Issue 93 and to agree a 6-month extension.**

1. Background

- 1.1 The Metering Codes of Practice (CoPs) detail the technical requirements for Metering Systems used for Settlement purposes. When Metering Equipment is first registered in Settlement, it must comply with the requirements that are set out in the relevant Code of Practice in place at that time. The CoPs are owned by the ISG and SVG as detailed in Appendix 1.
- 1.2 The SVG and ISG agreed, in October 2020, that the CoPs should be reviewed via a BSC Issue and agreed with a draft timetable and approach ([SVG236/02](#) and [ISG234/01](#)).
- 1.3 The approach included limiting the review to 12 months, with an additional six month contingency to be called upon, if needed, with ISG/SVG approval. This was put in place to control the risk of significant scope creep and a prolonged review. It also included, trying to progress any quick wins as the review progressed in a more agile manner, rather than waiting for the review to conclude before implementing any changes.
- 1.4 Issue 93 was raised by the [Association of Meter Operators](#) in January 2021. The Issue Group was tasked with prioritising and progressing a number of different items or aspects (see Appendix 2 – Summary of Aspects for consideration for details).

2. Issue 93 progress and achievements

- 2.1 To date, we have made good progress, holding five Issue Group meetings (see Appendix 4 – Issue 93 Meeting Summary for details), considered 70% of the aspects and raising three Change Proposals (CPs), targeting delivery for June 2022:
 - [CP1550 'Updates to monitoring of voltage alarms requirements'](#);
 - [CP1553 'Tightening the minimum accuracy class for Meters and CTs in CoPs 3, 5 and 10'](#); and
 - [CP1554 'Future proofing changes to the measurement transformer standards in the CoPs'](#)
- 2.2 Two further CPs are being prepared and we expect to raise them in February 2022

3. Retail Code Consolidation Significant Code Review Issue 93 impacts

- 3.1 Between March and June 2020 we had to pause work on Issue 93 to focus on supporting Ofgem with delivering its [Retail Code Consolidation Significant Code Review \(RCC SCR\)](#). It was expected that the RCC SCR would impact Issue 93, but it was not until Ofgem made its policy decision in [February 2021](#) that the exact impact could be determined.

- 3.2 We had to undertake a significant exercise to review and amend the Balancing and Settlement Code (BSC) and Code Subsidiary Documents (around 50 documents) to facilitate RCC SCR. Changes to the BSC were given effect via [P420 'Retail Code Consolidation Significant Code Review'](#).
- 3.3 This four month delay, the upcoming Christmas period and other competing priorities has resulted in the need to continue Issue 93 beyond 12 months. We therefore request that Issue 93 be extended six months, with the final Issue Group recommendations to be made by the end of June 2022. Please note that any outstanding recommendations, including any BSC Changes will be implemented after this period.
- 3.4 The Issue 93 Final Report will be submitted to the next available Panel meeting after June 2022, following Issue Group review.

4. RCC SCR CoPs impacts

- 4.1 In [Ofgem's Retail Energy Code v2.0 and Retail Code Consolidation Consultation decision](#), published in April 2021, it confirmed that the Supplier Volume Allocation Meter Operator Agent (SVA MOA) arrangements, including Qualification, would transfer from the BSC to the Retail Energy Code (REC). It would also require SVA MOAs to comply with the BSC CoPs.
- 4.2 Further, Ofgem re-iterated its support for the progression of Issue 93 and would not seek to move or amend the CoPs until the review was complete. Ofgem also noted that "should it be appropriate, we will work with BSCCo and RECCo to take forward any conclusions of the Issue Group in due course." We are continuing to engage with Ofgem and RECCo on the progress of Issue 93, including this requested extension.

5. Proposed timetable and plan

- 5.1 The table below is our proposed approach for addressing the remaining aspects of Issue 93. A more detailed progression plan can be found in Appendix 3.

Proposed Workgroup meeting	Aspects to review
January 2022	<ul style="list-style-type: none"> - Duplicate communications path for Metering Equipment within CoPs 1 and 2 - Security of using public IP addresses for Communications to Metering Systems - Inconsistent use of MWh vs KWh
March 2022	<ul style="list-style-type: none"> - Half Hourly (HH) vs Non Half Hourly (NHH) requirements - Calibration checks for Main and Check Meters
May 2022	<ul style="list-style-type: none"> - Determining the relevant CoP for Embedded circuits - Clarify Defined Metering Point (DMP) for Low Voltage (LV) supplies
June 2022	<ul style="list-style-type: none"> - Consolidation of the CoPs

6. Recommendations

- 6.1 We invite the ISG and SVG to:
- a) **AGREE** a six months extension to the Issue 93 timeline;
 - b) **COMMENT** on the timetable and approach detailed in this paper;
 - c) **NOTE** the progress we have made in Issue 93; and
 - d) **NOTE** that we intend to complete the review of all aspects by June 2022.

Appendices

Appendix 1 – CoP Ownership

Appendix 2 – Summary of Aspects for consideration

Appendix 3 – Proposed Progression Timetable

Appendix 4 – Issue 93 Meeting Summary

Attachments

Attachment A – Issue 93 Proposal Form

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Appendices

Appendix 1 – CoP Ownership

CoP	Title	Owner
COP_1	Code of Practice for the Metering of Circuits with a Rated Capacity Exceeding 100MVA for Settlement	ISG
COP_2	Code of Practice for the Metering of Circuits with a Rated Capacity Not Exceeding 100MVA for Settlement Purposes	ISG
COP_3	Code of Practice for the Metering of Circuits with a Rated Capacity Not Exceeding 10MVA for Settlement Purposes	ISG and SVG
COP_4	Code of Practice for the Calibration, Testing and Commissioning Requirements of Metering Equipment for Settlement Purposes	ISG and SVG
COP_5	Code of Practice for the Metering of Energy Transfers with a Maximum Demand of up to (and Including) 1MW for Settlement Purposes	SVG
COP_6	Code of Practice for the Metering of Energy Imports Via Low Voltage Circuits Fused at 100 Amps or Less Per Phase for Settlement Purposes	SVG
COP_7	Code of Practice for the Metering of Energy Imports Via Low Voltage Circuits Fused at 100 Amps or Less Per Phase for Settlement Purposes	SVG
COP_8	Code of Practice for the Metering of Import Active Energy Via Low Voltage Circuits for Non-Half Hourly Settlement Purposes	SVG
COP_9	Code of Practice for the Metering of Import and Export Active Energy Via Low Voltage Circuits for Non-Half Hourly Settlement Purposes	SVG
COP_10	Code of Practice for Whole Current Metering of Energy via Low Voltage Circuits for Settlement Purposes	SVG

Appendix 2 – Summary of Aspects for consideration

Aspect	Benefit	Impact on Settlement Risks	Considered by the Issue Group
Threshold boundaries between the CoP applicability is open to different interpretations	Remove ambiguity	Low	Yes
The current requirements for de-energising a circuit/feeder are inconsistent between the CoPs and do not adopt best practice. This could result in estimated data unnecessarily entering Settlement.	To ensure consistency and remove any ambiguity	Low	Yes
CoPs 6, 7, 8 and 9 are regarded as redundant. It is potentially misleading industry and undermining good governance to keep them. To maintain them fully would include wasteful effort by industry.	To remove redundant documents to make it easier to maintain and understand the CoPs	Low	Yes
Remote notification to manned locations of voltage failures is allowed in CoPS 1 &	To ensure still fit for use and reduce risk of incorrect	Low	Yes

2. This requires action on the next working day, whereas modern metering equipment should identify this within a day without a dependency on staff in a manned control room.	settlement data not being identified/resolved in a timely manner		
Tightening the minimum accuracy classes for Meters (CoP5) and CTs (CoPs 3,5 and 10))	To simplify the Overall Accuracy process and avoid non-material TAA NC's	Low	Yes
Changes to the measurement transformer standards in CoPs 1, 2, 3, 4, 5 and 10 are not future proof.	To prevent the stranding measurement transformer stocks.	Medium	Yes
The minimum burden requirement and CT ratio is not currently specified in the applicable CoPs	To avoid ambiguity and provide clarification	Low	Yes
Requirement in CoP1 and 2, to install duplicate remote communications paths to the Metering Equipment, is overly restrictive and has not kept up with the developments in technology	To provide consistency and simplify	Medium	To be considered
Security of using public IP addresses for Communications to Metering Systems,	Provide assurances on the security of providing IP communications via public connection methods	Medium	To be considered
Criteria to define cable loss materiality	To avoid ambiguity, simplify the process and provide clarity on the methodology for determining cable losses	Low/Medium	To be considered
Use of Half Hourly and non-Half Hourly within the CoPs are no longer appropriate	To simplify and ensure consistency	Low	To be considered
Not clear if the calibration checks and operation checks for main and check meters are being done and whether they are working, as there is currently no requirement to report on this	Support compliance reduce Settlement risk	Low	To be considered
Inconsistent use of energy units (MWh vs. kWh) and the granularity	To aid consistency	Low	To be considered
The obsolete metering requirements in the CoPs is not robust or clear. This poses a risk of erroneous or estimated data entering Settlement caused by faulty Metering Equipment.	Remove redundant requirements to aid understanding	Low	To be considered
Combining CoPs 1, 2, 3, 5 and 10 into a single CoP	To simplify and ensure consistency	Low	To be considered
Consider the issue on metering with unbalanced loads and if earthing transformers installed at site	To avoid ambiguity and provide clarification	Low	To be considered

Appendix 3 – Proposed Progression Timetable

Event	Date
Raise CP for Aspect_10 'Reactive Only Sites' and Aspect_16 'Obsolete Metering Equipment'	11 January 2022
6 th Meeting – Discuss Aspect_03 'Duplicate communications paths', Aspect_06 'Inconsistent use of MWh vs KWh' and Aspect_13 'Security of using public IP address'.	w/c 10 Jan 22
Progress first batch of quick win CPs	Jan - Mar
7 th meeting – Discuss Aspect_02 'HH vs NHH requirements' and Aspect_04 'Calibration checks for Main and Check Meters'	w/c 14 Mar 22
Progress second batch of quick win CPs	Mar to May 22
8 th meeting – Discuss Aspect_11 'Determining the relevant CoP for embedded circuits' and Aspect_18 'Clarify DMP for LV supplies'	w/c 26 May 22
Progress third batch of quick win CPs	May - Jun
9 th meeting – Discuss Aspect_01 'Consolidation of the CoPs'	w/c 6 Jun 22
Finalisation activities	Jun – Jul

Appendix 4 – Issue 93 Meeting Summary

The first Work group session was held on Friday 26 February 2021. The objectives of the meeting were to:

- Provide an overview of all of the aspects associated with the issue;
- Confirm any new additional aspect to be considered as part of the Issue 93 discussions; and
- Determine the prioritisation process for the aspects.

The main outcome of this meeting was the creation of a prioritisation tracker, which helped the Work group efficiently manage how the aspects were reviewed. You can find the meeting information and its associated documents can be found [here](#).

The second meeting took place on Monday 14 June. The objectives of this meeting were to:

- Review redlining which incorporated comments from the first meeting;
- Update the WG on how the aspects were prioritised;
- Ensure the WG were aware of what each aspect was raised to address; and
- Confirm the next steps with the WG.

The WG decided to progress three CPs to address some of the aspects. More information on this meeting and its associated documents can be found [here](#).

The third Work group session was held on Thursday 19 August 2021. The objectives of this meeting were to:

- Update the WG on the progress of the progressed CPs;
- Confirm subgroup members to discuss specific aspects; and
- Confirm the next set of aspects to focus on.

The main outcomes of this meeting were the confirmation of subgroup members and a new priority list of aspects. The WG agreed to arrange subgroup sessions to facilitate the discussion on specific aspects. The purpose of this activity was to utilise external Subject Matter Experts (SME) knowledge on specific aspects. More information on this meeting and its associated documents can be found [here](#).

The fourth Work group session was held on Friday 17 September 2021. The objectives of this meeting were to:

- Make the WG aware of the CPs that Elexon were about to raise externally;
- Make the WG aware of Elexon's plan to arrange the subgroup meetings as agreed in the previous Work group meeting; and
- Provide an update on redlined documents.

More information on this meeting and its associated documents can be found [here](#).

Two subgroup meetings were booked as agreed with the Issue 93 WG. The first subgroup meeting was held on Friday 29 October 2021, more information can be found [here](#). This meeting was set up to discuss the aspect of Issue 93, which looked at specifying an appropriate minimum burden and Current Transformer (CT) ratio for the relevant CoPs.

The second meeting was held on Friday 5 November 2021, more information can be found [here](#). The purpose of this meeting was to discuss how certain elements of the Metering System are measured and to suggest a text to the WG that looked at defining the number of measuring elements in Section 5.1 'Measurement Transformers' of the CoPs.

The Work group gathered for a fifth session on Friday 26 November 2021. The objectives of this meeting were to:

- Recommend two potential CPs;
- Update the Work group on subgroup's discussions;
- Review updated redlining and prioritised aspects; and
- Update the Work group on our plans to seek a further 6 months extension for Issue 93.

More information on this meeting and its associated documents can be found [here](#).